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*Proposed Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the lead case,
No. 19-30088(DM)*

Bankruptcy Case
No. 19-30088 (DM)
Chapter 11

(Lead Case)
(Jointly Administered)

**APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN
ORDER PURSUANT TO 11 U.S.C.
§§328(A) AND 1103 AND FED. R.
BANKR. P. 2014(A) FOR
AUTHORIZATION TO RETAIN
AND EMPLOY FTI CONSULTING,
INC. AS FINANCIAL ADVISOR
NUNC PRO TUNC TO FEBRUARY
12, 2019**

Dated: April 24, 2019
Time: 9:30AM Pacific Time
Place: United State Bankruptcy Court,
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 The Official Committee of Unsecured Creditors (the “**Committee**”) appointed pursuant to
2 section 1102 of title 11 of the United States Code §§ 101 et seq. (the “**Bankruptcy Code**”) in these
3 chapter 11 cases (the “**Chapter 11 Cases**”) of the above captioned debtors and debtors-in-
4 possession (collectively, the “**Debtors**”) hereby submit this application (the “**Application**”),
5 pursuant to sections 328(a) and 1103 the Bankruptcy Code, and Rule 2014 of the Federal Rules of
6 Bankruptcy Procedure (the “**Bankruptcy Rules**”) for entry an order (the “**Proposed Order**”),
7 substantially in the form attached to this Application as **Exhibit A**, authorizing the retention and
8 employment of FTI Consulting, Inc. (together with its wholly owned subsidiaries, contractors and
9 employees, “**FTI**”) as financial advisor to the Committee *nunc pro tunc* to the Formation Date
10 (defined below). In support of this Application, the Committee submits the *Declaration of Samuel*
11 *E. Star in Support of Application of the Official Committee of Unsecured Creditors for Entry of an*
12 *Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R. Bankr. P. 2014(a) for Authorization*
13 *to Retain and Employ FTI Consulting, Inc. as Financial Advisors Nunc Pro Tunc February 12,*
14 *2019* (the “**Star Declaration**”), attached to this Application as **Exhibit B**, and respectfully state
15 as follows:
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17

18 **JURISDICTION AND VENUE**

- 19 1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and
20 1334.
- 21 2. This is a core proceeding pursuant to 28 U.S.C. § 157(b). The Committee consents
22 to the entry of a final judgment or order with respect to this Application if it is determined that the
23 Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article
24 III of the United States Constitution.
- 25 3. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
- 26
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BACKGROUND

A. GENERAL BACKGROUND

4. On January 29, 2019 (the “**Petition Date**”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing these chapter 11 cases (the “**Chapter 11 Cases**”). The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On February 12, 2019 (the “**Formation Date**”), the Office of the United States Trustee for the Northern District of California (the “**U.S. Trustee**”) appointed nine members to the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. On the Formation Date, the Committee selected FTI Consulting, Inc. as its financial advisor.

B. SCOPE OF SERVICES

6. FTI has been providing and will continue to perform the following services, with the goal of assisting the Committee to maximize value for all constituents. Among other things, FTI has provided, or will provide on a prospective basis upon the court’s approval of this Application, services in the following categories (the “**Services**”):

- (a) Assistance in the review of financial related disclosures required by the Court, including the Schedules of Assets and Liabilities, the Statement of Financial Affairs and Monthly Operating Reports;
- (b) Assistance with the assessment and monitoring of the Debtors’ short-term cash flow, liquidity, and operating results;
- (c) Assistance with the review of the Debtors’ proposed motions or requests for relief, including the Debtors’ proposed operational integrity supplier, cash management, customer program, key employee incentive/retention and other employee benefit programs motions;
- (d) Assistance with the review of the Debtors’ long-term financial projections, including cash generating capacity and identification of potential cost savings, including overhead and operating expense reductions and efficiency improvements;
- (e) Assistance with the review of the Debtors’ cost/benefit analysis with respect to the affirmation or rejection of various executory contracts and leases;

- 1 (f) Assistance with the review of the Debtors' corporate structure including analysis
of intercompany activities and claims;
- 2 (g) Assistance with the review of any tax issues associated with, but not limited to,
3 claims/stock trading, preservation of net operating losses, refunds due to the
4 Debtors, plans of reorganization, and asset sales;
- 5 (h) Assistance in the review of the claims reconciliation and estimation process,
including potential exposure from wildfire damage claims;
- 6 (i) Assistance in the development of communications strategies with various
7 stakeholders including regulatory agencies and state government officials and
8 commissions;
- 9 (j) Attendance at meetings and assistance in discussions with the Debtors, potential
investors, banks, other secured lenders, the Committee, and other official or
10 unofficial committees organized in these Chapter 11 Cases, the U.S. Trustee, other
parties in interest and professionals hired by the same, as requested;
- 11 (k) Assistance in the review and/or preparation of information and analysis necessary
12 for the confirmation of a plan and related disclosure statement in these chapter 11
proceedings;
- 13 (l) Assistance in the evaluation and analysis of avoidance actions, including fraudulent
14 conveyances and preferential transfers;
- 15 (m) Assistance in the prosecution of Committee responses/objections to the Debtors'
16 motions, including attendance at deposition and provision of expert
reports/testimony on case issues as required by the Committee; and
- 17 (n) Render such other general business consulting or such other assistance as the
18 Committee or its counsel may deem necessary that are consistent with the role of a
19 financial advisor and not duplicative of services provided by other professionals in
this proceeding.

20 7. In addition, the Committee will retain the services of other professionals over the
21 course of these Chapter 11 Cases. Already, the Committee has retained Centerview Partners LLC
22 ("**Centerview**") as investment banker and Milbank LLP ("**Milbank**") as counsel. The services
23 provided by Centerview will focus on financing alternatives, including economics of post-petition
24 and exit financing, enterprise valuation, asset sales assessments, strategic alternative and post-
25 emergence capital structure issues. Milbank will provide legal counsel as the attorneys to the
26 Committee.
27
28

1 8. The Committee and FTI intend that all of the services that FTI will provide to the
2 Committee will be appropriately directed by the Committee so as to avoid duplication of efforts
3 among the other professionals retained in these Chapter 11 Cases and performed in accordance
4 with applicable standards of the profession. FTI will work closely with the Committee's other
5 retained professionals to prevent any duplication of efforts in the course of advising the
6 Committee.

7
8 **C. FTI'S QUALIFICATIONS**

9 9. The Committee has decided to retain the services of FTI based upon, among other
10 things, the Committee's need to: (i) monitor and evaluate the Debtors' operations, cash flows, and
11 business plans and (ii) monitor and evaluate the Debtors' efforts to reorganize and maximize the
12 value of their estates for creditors. The Committee respectfully submits that the services of a
13 financial advisor are necessary and appropriate to enable it to evaluate the complex financial and
14 economic issues raised by the Debtors' Chapter 11 Cases and to fulfill its statutory duties
15 effectively.

16
17 10. The Committee reviewed materials prepared by and heard pitches made by FTI
18 and several other financial advisor candidates prior to selecting FTI as the Committee's financial
19 advisor. The Committee selected FTI based on, among other factors, (a) the Committee's
20 determination that (i) FTI was the best candidate to provide the services needed by the Committee
21 in the Chapter 11 Cases, and (ii) FTI's proposed fee structure, which the Committee believed to
22 be competitive and appropriate given its understanding of the facts and circumstances of the
23 Chapter 11 Cases and (b) FTI's extensive experience and excellent reputation in providing services
24 in areas ranging from corporate finance and interim management to economic consulting, forensic
25 and litigation consulting, strategic communications, and technology.

26
27 11. FTI is a global advisory firm which, through its five practice groups and affiliated
28 entities, and its nearly 4,600 employees in twenty-eight countries, provides a variety of services to

1 third parties including by way of example and not limitation, Forensic and Litigation Consulting,
2 Technology Services, Corporate Finance & Restructuring, Economic Consulting and Strategic
3 Communications. FTI's clients include many of the world's largest companies, as well as a
4 majority of the ten largest bank holding companies and nearly all of the top one hundred law firms
5 in the world. Within the Corporate Finance & Restructuring business segment, FTI's expertise
6 includes liquidity and capital structure assessment, debt and equity restructuring advice and
7 identification of reorganization alternatives.

8
9 12. FTI has advised management, senior lenders, and unsecured creditors in numerous
10 significant restructurings and turnarounds in recent years, including *In re Energy Future Holdings*
11 *Corp., et al.*; *In re FirstEnergy Solutions Corp., et al.*; *In re iHeartMedia, Inc., et al.*; *In re Cenveo,*
12 *Inc. et al.*; *In re Sears Holding Corporation, et al.*; *In re Westmorland Coal Company, et al.*; *In re*
13 *Pacific Exploration & Production; In re R.E. Gas Development, LLC (Rex Energy), et al.*; *In re*
14 *The Weinstein Company Holdings LLC; In re Claire's Stores, Inc., et al.*; *In re Ultra Petroleum*
15 *Corporation, et al.*; *In re Peabody Energy Corporation, et al.*; *In re Premier Oil & Gas, Inc., et al.*
16 and the restructuring of the Commonwealth of Puerto Rico among others. FTI has a wealth of
17 experience in restructuring and financial advisory services and enjoys an excellent reputation for
18 services rendered in large and complex chapter 11 cases on behalf of debtors and creditors
19 throughout the United States.

20
21 13. In preparing to advise the Committee, not only does FTI have extensive experience
22 in comparable restructuring matters, but it has become familiar with the Debtors' businesses,
23 financial affairs, and capital structure. Since its engagement, FTI has worked closely with the
24 Committee and its professionals in assisting with the myriad requirements of these Chapter 11
25 Cases. Accordingly, the Committee believes that FTI has developed substantial relevant
26 experience regarding the Debtors and the circumstances of these Chapter 11 Cases. For these
27 reasons, FTI is particularly qualified and uniquely suited to deal effectively and efficiently with
28

1 matters that may arise in the context of these cases.

2 **D. FTI'S DISINTERESTEDNESS**

3 14. FTI has informed the Committee that, to the best of FTI's knowledge, information,
4 and belief, other than as set forth in the Star Declaration and the exhibits thereto, FTI: (a) has no
5 connection with the Debtors, their creditors, their equity security holders or other parties in interest
6 or their respective attorneys or accountants, the U.S. Trustee, or any person employed in the office
7 of the U.S. Trustee in any matter related to the Debtors and their estates and (b) does not hold or
8 represent any interest adverse to the estate, and therefore believes it is eligible to represent the
9 Committee under Bankruptcy Code section 1103(b).
10

11 15. In connection with the preparation of this Application, FTI requested and obtained
12 from the Debtors' proposed counsel a list of interested parties and significant creditors in these
13 Chapter 11 Cases (collectively, the "**Potential Parties in Interest**"). A list of the Potential Parties
14 in Interest is reflected on **Schedule A** attached to the Declaration.
15

16 16. FTI then compared the names of each of the Potential Parties in Interest to the
17 names contained in a database of current and former clients and other relationships (the "**Client**
18 **Database**"). The Client Database generally includes: (i) the name of each client of FTI; (ii) the
19 name of each party who is or was known to be adverse to such client of FTI in connection with the
20 matter in which FTI is or was engaged for such client; (iii) the name of each party that has, or had,
21 a substantial role with regard to the subject matter of FTI's retention; and (iv) the names of FTI
22 professionals who are, or were, primarily responsible for matters for such clients.
23

24 17. An email was issued to all managing directors and senior managing directors of
25 FTI, requesting disclosure of information regarding: (i) any known personal or professional
26 connections between the respondent and/or FTI on the one hand, and the Debtors and/or its
27
28

1 affiliates, on the other hand;¹ (ii) any known representations by the respondent and/or FTI of any
2 of the Debtors and/or its affiliates in any matter; and (iii) any other conflict or reason why FTI
3 may be unable to represent the Committee in the Chapter 11 Cases.

4 18. A listing of any relationships between FTI and the Debtors or the Potential Parties
5 in Interest is annexed to the Declaration. FTI will supplement the Declaration and its schedules as
6 FTI continues to review Potential Parties in Interest and as additional facts bearing on these
7 Chapter 11 Cases are known. By way of further disclosure:

8 (a) From time to time, FTI, which is providing the services in these Chapter
9 11 Cases, has provided services, and likely will continue to provide services to certain
10 attorneys, professionals, creditors (including lenders) and/or security holders of the
11 Debtors and various other parties, some of whom may be providing services to, or may be
12 adverse to, or may be otherwise connected to, the Debtors, in each case in matters unrelated
13 to these Chapter 11 Cases.
14

15 (b) FTI is engaged in providing various consulting services through five
16 business segments: Corporate Finance & Restructuring, Economic Consulting, Forensic &
17 Litigation Consulting, Strategic Communications and Technology services globally to a
18 wide range of institutions and individuals and may in the past have had, and may currently
19 or in the future have, financial advisory or other investment banking or consulting
20 relationships with parties that may have interests with respect to the Debtors or members
21 of the Committee. Each of the FTI's five business segments is separate and distinct from
22 the other, with separate employees and management. Compass Lexecon is a wholly-owned
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24

25
26 ¹ In reviewing its records and the relationships of its professionals, FTI did not seek information as to whether
27 any FTI professional or member of his/her immediate family: (a) indirectly owns, through a public mutual fund or
28 through partnerships in which certain FTI professionals have invested but as to which such professionals have no
control over or knowledge of investment decisions, securities of the Debtors or any other party in interest; or (b) has
engaged in any ordinary course consumer transaction with the Debtors or any party in interest. If any such relationship
does exist, it does not impact FTI's disinterestedness or otherwise give rise to a finding that FTI holds or represents
an interest adverse to the Debtors' estates.

1 subsidiary of FTI that provides economic consulting services, and operates separately from
2 FTI, with separate management and employees. In most locations, FTI and Compass
3 Lexecon work out of separate office locations.

4 (c) In the ordinary course of business, investment funds in which FTI's
5 employees may have financial interests, but over whose investment decisions such
6 employees have no input or control, may acquire, hold or sell, long or short positions, or
7 trade or otherwise effect transactions, in debt, equity, and other securities and financial
8 instruments (including bank loans and other obligations) of, or investments in, the Debtors
9 or other parties that may have an interest in these Chapter 11 Cases or have other
10 relationships with such parties. With respect to any such securities, financial instruments,
11 and/or investments, all rights in respect of such securities, financial instruments, and
12 investments, including any voting rights, will be exercised by the holder of the rights, in
13 its sole discretion. Moreover, the FTI Committee Professionals are subject to compliance
14 mechanisms and policies and procedures designed to prevent confidential, non-public
15 information from being improperly shared.
16
17

18 (d) In the ordinary course of its business, FTI from time to time discusses
19 issues concerning stressed and distressed companies with creditors and prospective
20 creditors that are clients of the firm, or that otherwise contact FTI, or that are referred to
21 the firm in light of FTI's reputation for covering such companies and/or relevant industry
22 expertise. At the time of those contacts, it is not known whether any particular company
23 will actually file for bankruptcy, or if any of these creditors and/or potential creditors will
24 serve on any future creditors' committee, or even be a creditor of the relevant estate in the
25 event of a future bankruptcy. It is also FTI's customary practice to communicate with and,
26 when appropriate or requested, send materials to one, or more, of the unsecured creditors
27 identified by a debtor and who are, therefore, potential members of a creditors' committee,
28

1 if we either know, work with, are contacted by, or are otherwise referred to the relevant
2 creditor. In some circumstances, we may contact potential committee members with whom
3 we are not previously familiar.

4 (e) FTI personnel may have business associations with certain creditors of
5 the Debtors or counsel or other professionals involved in these Chapter 11 Cases on
6 matters unrelated to these Chapter 11 Cases. In addition, in the ordinary course of its
7 business, FTI may engage counsel or other professionals in unrelated matters who now
8 represent, or in the future may represent, creditors or other interested parties in these
9 Chapter 11 Cases.
10

11 18. Given the large number of parties in interest in these Chapter 11 Cases, despite the
12 efforts described above to identify and disclose FTI's relationships with parties in interest in these
13 Chapter 11 Cases, FTI is unable to state with complete certainty that every client relationship or
14 other connection has been disclosed. In particular, among other things, FTI may have relationships
15 with persons who are beneficial owners of parties in interest and persons whose beneficial owners
16 include parties in interest or persons who otherwise have relationships with parties in interest.
17

18 19. As these Chapter 11 Cases progress, new parties may become parties in interest and
19 similarly, FTI may have been engaged, may currently be engaged and may in the future be engaged
20 by such new parties in interest in matters unrelated to these Chapter 11 Cases. Also, FTI may have
21 engaged or had mutual clients with, may have a current engagement or have mutual clients with
22 and may in the future engage or have mutual clients with certain law firms, financial advisors,
23 accounting firms, or other professionals that are Potential Parties in Interest or may become parties
24 in interest, all in matters unrelated to these cases. In addition, FTI may have also been engaged
25 by, be currently engaged by, or in the future be engaged by persons who are creditors or
26 shareholders of the Debtors and/or the members of the Committee, otherwise have a business
27 relationship with the Debtors and/or the Committee, or who are competitors of or customers of the
28

1 Debtors and/or the Committee. Potential Parties in Interest, persons that may become parties in
2 interest in these Chapter 11 Cases, and persons that have business relationships with the Debtors
3 and/or the Committee, that are competitors of the Debtors and/or the Committee, or that are
4 customers of the Debtors and/or the Committee, may be: (a) parties in interest in other bankruptcy
5 cases where FTI is engaged or (b) may be affiliates of or creditors of persons who may have
6 engaged, have currently engaged, or may in the future engage FTI. In the ordinary course of its
7 business, FTI may also purchase services or products from Potential Parties in Interest and other
8 persons that are or may become parties in interest in these Chapter 11 Cases.
9

10 20. Moreover, FTI's employees may have relationships with persons that may become
11 parties in interest in these Chapter 11 Cases, and/or persons that have business relationships with
12 the Debtors, are competitors of the Debtors or that are customers of the Debtors.

13 21. Further, some of FTI's employees may have, or may in the future have, personal
14 investment in funds, or other investment vehicles, over whose investment decisions such
15 employees have no input or control. Such entities may have made, or may in the future make,
16 investment in the claims or securities of the Debtors, or those of their creditors, or other parties in
17 interest in these Chapter 11 Cases.
18

19 22. Based on the foregoing, the Committee believes that FTI is a "disinterested person"
20 as that term is defined in section 101(14) of the Bankruptcy Code. FTI is not believed to be a
21 "creditor" with respect to fees and expenses of any of the Debtors within the meaning of section
22 101(10) of the Bankruptcy Code. FTI is not believed to hold or represent any interest adverse to
23 the estate, and therefore is eligible to represent the Committee under Bankruptcy Code section
24 1103(b). FTI has informed the Committee that it will conduct an ongoing review of its files to
25 ensure that no conflicts or other disqualifying circumstances exist or arise. To the extent FTI
26 discovers any new material relevant facts bearing on the matters described herein during the period
27 of FTI's employment, FTI will amend and supplement the information contained in the Declaration
28

1 to disclose any additional facts and will promptly file a Bankruptcy Rule 2014(a) Supplemental
2 Declaration.

3 **E. TERMS OF RETENTION**

4 23. FTI is not owed any prepetition fees or expenses related to the services performed
5 on behalf of the Committee. FTI has informed the Committee that to the extent any money is
6 owed to FTI by the Debtors on account of prepetition fees or expenses in matters involving the
7 Debtors but unrelated to these Chapter 11 Cases, FTI will waive such amounts. Subject to approval
8 by the Court, the Committee proposes to employ and retain FTI to serve as the Committee's
9 financial advisor on the following terms:
10

11 a) The customary hourly rates, subject to periodic adjustments, charged by FTI
12 professionals anticipated to be assigned to these cases are as follows:

- | | |
|---|-----------------|
| 13 i. Senior Managing Directors | \$725 – \$1,260 |
| 14 ii. Directors / Senior Directors/ Managing Directors | \$510 – \$880 |
| 15 iii. Consultants / Senior Consultants | \$310 – \$640 |
| 16 iv. Administrative / Paraprofessionals | \$125 – \$275 |

17 b) Reimbursement of actual, necessary costs and expenses incurred in connection with
18 the rendering of its services in these Chapter 11 Cases, including fees and expenses of
19 attorneys engaged in connection with retention or fee applications; and
20

21 c) Indemnification on the terms described below.

22 24. FTI intends to apply for compensation for professional services rendered and
23 reimbursement of expenses incurred in connection with these Chapter 11 Cases, subject to the
24 Court's approval and in compliance with applicable provisions of the Bankruptcy Code, the
25 Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and any other applicable
26 procedures and orders of the Court, including any order approving this Application (to the extent
27 compliance is not waived) and consistent with the proposed compensation set forth above.
28

1 25. FTI will maintain records in support of any actual, necessary costs and expenses
2 incurred in connection with the rendering of its services in these Chapter 11 Cases. In the event
3 FTI seeks reimbursement for attorneys' fees during the term of the Chapter 11 Cases, FTI will
4 include the applicable invoices and supporting time records from such attorneys (in summary form
5 and redacted for privilege and work product). Such attorneys do not need to have been retained
6 under section 327 of the Bankruptcy Code.

7
8 26. FTI believes that the fee structure is reasonable and comparable to those generally
9 charged by creditors' committee financial advisors and consultants of similar stature to FTI for
10 comparable engagements, both in and out of chapter 11.

11 **F. INDEMNIFICATION**

12 27. In addition to the preceding, and as a material part of the consideration for the
13 agreement of FTI to furnish services to the Committee pursuant to the terms of this Application,
14 the Committee and FTI agree to the provisions indemnifying FTI as set forth below. FTI believes
15 that the following indemnification terms are customary and reasonable for financial advisors in
16 chapter 11 cases:
17

18 (a) Subject to the provisions of subparagraphs (b) and (c) below and approval of the
19 Court, the Debtors are authorized to indemnify, and shall indemnify, FTI for any
20 claims arising from, related to, or in connection with FTI's engagement under this
21 Application, but not for any claim arising from, related to, or in connection with
22 FTI's post-petition performance of any other services other than those in connection
23 with the engagement, unless such post-petition services and indemnification
24 therefore are approved by this Court; and

25 (b) The Debtors shall have no obligation to indemnify FTI for any claim or expense
26 that is either (i) judicially determined (the determination having become final) to
27 have arisen primarily from FTI's gross negligence, willful misconduct or fraud
28 unless the Court determines that indemnification would be permissible pursuant to
In re United Artists Theatre company, et al., 315 F.3d 217 (3d Cir. 2003), or (ii)
settled prior to a judicial determination as to FTI's gross negligence, willful
misconduct or fraud, but determined by this Court, after notice and a hearing, to be
a claim or expense for which FTI is not entitled to receive indemnity under the
terms of this Application; and

1 (c) If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in
2 these cases (that order having become a final order no longer subject to appeal),
3 and (ii) the entry of an order closing these chapter 11 cases, FTI believes that it is
4 entitled to the payment of any amounts by the Debtors on account of the Debtors'
5 indemnification obligations under this Application, including, without limitation,
6 the advancement of defense costs, FTI must file an application in this Court, and
7 the Debtors may not pay any such amounts to FTI before the entry of an order by
8 this Court approving the payment. This subparagraph (c) is intended only to specify
9 the period of time under which the Court shall have jurisdiction over any request
10 for fees and expenses by FTI for indemnification, and not as a provision limiting
11 the duration of the Debtors' obligation to indemnify FTI.

12 **RELIEF REQUESTED**

13 23. By this Application, the Committee is seeking to continue to employ FTI pursuant
14 to sections 328(a) and 1103 of the Bankruptcy Code and Rule 2014 in accordance with the terms
15 set forth herein.

16 **BASIS FOR RELIEF**

17 24. By this Application, the Committee respectfully requests the entry of the Proposed
18 Order, substantially in the form attached hereto as **Exhibit A** authorizing the Committee to employ
19 and retain FTI as their financial advisor.

20 25. The Committee respectfully requests that the Court approve FTI's retention *nunc*
21 *pro tunc* to the Formation Date. Since that time, FTI has been providing critical services to the
22 Committee, including (i) reviewing operating and financial information relating to the approval
23 process for the "first day" motions; (ii) conducting general due diligence on the Debtors' business
24 and case matters; (iii) meeting with the Debtors' advisors and other professionals involved in the
25 Chapter 11 Cases; and (iv) participating in telephonic meetings with, and on behalf of, the
26 Creditors Committee.

27 26. The Committee submits that the retention of FTI is appropriate under section
28 328(a) of the Bankruptcy Code. Section 328(a) provides, in relevant part, that a creditor's
committee "may employ or authorize the employment of a professional person under section 327

1 or 1103 . . . on any reasonable terms and conditions of employment, including on a retainer, on an
2 hourly basis, on a fixed or percentage fee basis, or on a contingent fee basis.” 11 U.S.C. § 328(a).

3
4 27. Further, section 1103(a) of the Bankruptcy Code provides, in relevant part, that a
5 creditors’ committee, with the Court’s approval, “may select and authorize the employment by such
6 committee of one or more attorneys, accountants, or other agents, to represent or perform services
7 for such committee.” 11 U.S.C. § 1103(a). Lastly, Rule 2014 provides, in relevant part, that “[a]n
8 order approving the employment of . . . professionals pursuant to . . . § 1103 . . . of the Code shall
9 be made only on application of the trustee or committee.” Fed. R. Bankr. P. 2014(a).

10
11 28. The employment of FTI and its professionals by the Committee are reasonable and
12 in line with the terms and conditions typical for engagements of this size and character. *See, e.g.,*
13 *In re Aegean Marine Petroleum Network Inc., et al.*, No. 18-13374 (MEW) (Bankr. S.D.N.Y.
14 November 6, 2018) [Docket Nos. 250 & 307]; *In re The NORDAM Group, Inc., et al.*, No. 18-
15 11699 (MFW) (Bankr. D. Del. July 22, 2018) [Docket Nos. 230 & 300]; *In re FirstEnergy*
16 *Solutions Corp., et al.*, No. 18-50757 (AMK) (Bankr. N.D. Ohio March 31, 2018) [Docket Nos.
17 576 & 729]; *In re EXCO Resources, Inc., et al.*, No. 18-30155 (MI) (Bankr. S.D. Tex. January 15,
18 2018) [Docket Nos. 383 & 528]; *In re BCBG Max Azria Global Holdings, LLC, et al.*, No. 17-
19 10466 (SCC) (Bankr. S.D.N.Y. February 28, 2017) [Docket Nos. 225 & 355]; *In re Freedom*
20 *Communications, Inc., et al.*, No. 15-15311 (MW) (Bankr. C.D. Cal. November 1, 2015) [Docket
21 Nos. 183 & 279]; and *In re The Great Atl. & Pac. Tea Co., et al.*, No. 15-23007 (RDD) (Bankr.
22 S.D.N.Y. Aug. 11, 2015) [Docket Nos. 677 & 1058]. Because the Committee will require
23 substantial assistance with these Chapter 11 Cases, it is reasonable for the Committee to seek to
24 employ and retain FTI to serve as its financial advisor on the terms and conditions set forth herein.
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29. Finally, to the best of the Committee's knowledge, information, and belief, FTI does not have any interest materially adverse to the Debtors' estates or any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason. Further, the Committee understands that FTI believes it is disinterested because, to the best of FTI's knowledge, information, and belief, FTI has no connection with the Debtors, their creditors, or any other party-in-interest, except as disclosed in the Star Declaration.

NOTICE

30. Notice of this Application has been provided to (i) the Office of the United States Trustee for Region 17 (Attn: Andrew Vara, Esq. and Timothy Laffredi, Esq.); (ii) counsel to the Debtors; (iii) counsel to the Tort Claimants Committee; (iv) counsel to the Engineers and Scientists of California Local 20; (v) the Securities and Exchange Commission; (vi) the Internal Revenue Commission; (vii) the Office of the California Attorney General; (viii) the California Public Utilities Commission; (ix) the Nuclear Regulatory Commission; (x) the Federal Energy Regulatory Commission; (xi) the Office of the United States Attorney for the Northern District of California; (xii) counsel to the agent under the Debtors' debtor in possession financing facility; and (xiii) those persons who have formally appeared in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002. The Committee submits that such notice is sufficient and no other or further notice need be provided. No previous request for the relief sought herein has been made to this or any other court.

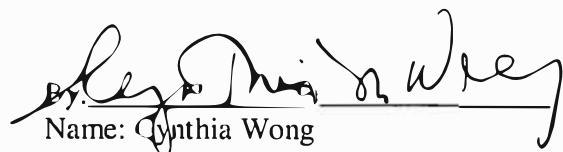
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WHEREFORE, the Committee respectfully request entry of the Proposed Order (a)
authorizing the Committee to engage FTI in accordance with this Application and (b) granting
the Committee such other and further relief as this court may deem just and proper.

Dated: April 3, 2019

Respectfully Submitted,

**THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF PG&E CORPORATION AND
PACIFIC GAS AND ELECTRIC COMPANY**



Name: Cynthia Wong
Corporate Finance & Restructuring
Pension Benefit Guaranty Corporation

Exhibit A

(Proposed Order)

1 Dennis F. Dunne (admitted *pro hac vice*)
2 Samuel A. Khalil (admitted *pro hac vice*)
3 MILBANK LLP
4 55 Hudson Yards
5 New York, New York 10001-2163
6 Telephone: (212) 530-5000
7 Facsimile: (212) 530-5219

8 *and*

9 Paul S. Aronzon (SBN 88781)
10 Gregory A. Bray (SBN 115367)
11 Thomas R. Kreller (SBN 161922)
12 MILBANK LLP
13 2029 Century Park East, 33rd Floor
14 Los Angeles, CA 90067
15 Telephone: (424) 386-4000
16 Facsimile: (213) 629-5063

17 *Proposed Counsel for the Official Committee*
18 *of Unsecured Creditors*

19 **UNITED STATES BANKRUPTCY COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN FRANCISCO DIVISION**

22 **In re:**

23 **PG&E CORPORATION,**

24 **-and-**

25 **PACIFIC GAS AND ELECTRIC**
26 **COMPANY,**

27 **Debtors.**

- 28 ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the lead case,
No. 19-30088(DM)

Bankruptcy Case
No. 19-30088 (DM)
Chapter 11
(Lead Case)

(Jointly Administered)

ORDER PURSUANT TO 11 U.S.C.
§§328(A) AND 1103 AND FED. R.
BANKR. P. 2014(A) FOR
AUTHORIZATION TO RETAIN AND
EMPLOY FTI CONSULTING, INC.
AS FINANCIAL ADVISOR NUNC
PRO TUNC TO FEBRUARY 12, 2019

Dated: April 24, 2019
Time: 9:30AM Pacific Time
Place: United State Bankruptcy Court,
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Upon consideration of the *Application of the Official Committee of Unsecured Creditors for*
2 *Entry of an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R. Bankr. P. 2014(a) for*
3 *Authorization to Retain and Employ FTI Consulting, Inc. as Financial Advisors Nunc Pro Tunc to*
4 *February 12, 2019* (the “**Application**”)¹ of the Official Committee of Unsecured Creditors (the
5 “**Committee**”) appointed pursuant to section 1102 of title 11 of the United States Code §§ 101 et seq.
6 (the “**Bankruptcy Code**”) in these chapter 11 cases (the “**Chapter 11 Cases**”) of the above captioned
7 debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order pursuant to section
8 328(a) and 1103 of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure
9 (the “**Bankruptcy Rules**”) authorizing the retention and employment of FTI Consulting, Inc. (together
10 with its wholly owned subsidiaries, contractors and employees, “**FTI**”) *nunc pro tunc* to February 12,
11 2019; and the Court having found that the Court has jurisdiction over this matter pursuant to 28 U.S.C.
12 §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. §
13 157(b)(2); and the Court having found that venue of this proceeding and the Application in this District
14 is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Application having been given as
15 provided in the Application, and such notice having been adequate and appropriate under the
16 circumstances, and it appearing that no other or further notice need be provided; and the Court having
17 reviewed the Application and having heard the statements in support of the relief requested therein at
18 a hearing, if any, before the Court; and the Court having determined that the terms and conditions of
19 FTI’s employment, including the fee structure and indemnification provisions, set forth in the
20 Application are reasonable as required by section 328(a) of the Bankruptcy Code; and upon the Court
21 finding that FTI represents no adverse interests in connection with these cases and that it is a
22 disinterested person as that term is defined in section 101(14) of the Bankruptcy Code; and upon further
23 finding that the employment of FTI is necessary and is in the best interests of the Committee; and the
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28 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Application.

1 relief requested in the Application being warranted; and after due deliberation and sufficient cause
2 appearing therefor,

3 **IT IS HEREBY ORDERED THAT:**

4 1. The Application is GRANTED as set forth herein;

5 2. The Committee is authorized to employ FTI as financial advisors *nunc pro tunc* to
6 February 12, 2019, in accordance with the terms set forth in the Application, without the need for any
7 further action on the part of FTI or the Committee to document such retention.
8

9 3. The Debtors shall be bound by the indemnification, contribution, and reimbursement
10 provisions below and will indemnify and hold harmless FTI, subject, during the pendency of these
11 chapter 11 cases, to the following:

12 (a) Subject to the provisions of subparagraphs (b) and (c) below and approval of
13 the Court, the Debtors are authorized to indemnify, and shall indemnify, FTI
14 for any claims arising from, related to, or in connection with FTI's engagement
15 under this Application, but not for any claim arising from, related to, or in
16 connection with FTI's post-petition performance of any other services other
than those in connection with the engagement, unless such post-petition
services and indemnification therefore are approved by this Court; and

17 (b) The Debtors shall have no obligation to indemnify FTI for any claim or expense
18 that is either (i) judicially determined (the determination having become final)
19 to have arisen primarily from FTI's gross negligence, willful misconduct or
20 fraud unless the Court determines that indemnification would be permissible
21 pursuant to *In re United Artists Theatre company, et al.*, 315 F.3d 217 (3d Cir.
2003), or (ii) settled prior to a judicial determination as to FTI's gross
negligence, willful misconduct or fraud, but determined by this Court, after
notice and a hearing, to be a claim or expense for which FTI is not entitled to
receive indemnity under the terms of this Application; and

22 (c) If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in
23 these cases (that order having become a final order no longer subject to appeal),
24 and (ii) the entry of an order closing these chapter 11 cases, FTI believes that it
25 is entitled to the payment of any amounts by the Debtors on account of the
26 Debtors' indemnification obligations under this Application, including, without
27 limitation, the advancement of defense costs, FTI must file an application in
28 this Court, and the Debtors may not pay any such amounts to FTI before the
entry of an order by this Court approving the payment. This subparagraph (c)
is intended only to specify the period of time under which the Court shall have
jurisdiction over any request for fees and expenses by FTI for indemnification,

1 and not as a provision limiting the duration of the Debtors' obligation to
2 indemnify FTI.

3 4. FTI shall file fee applications for allowance of compensation for services rendered and
4 reimbursement of expenses incurred (including, without limitation, the reasonable fees, disbursements
5 and other charges of FTI's counsel, which counsel shall not be required to be retained pursuant to
6 sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, and any applicable Local Rules
7 or orders of this Court); provided, that in the event that FTI seeks reimbursement from the Debtors for
8 attorneys' fees and expenses consistent with the terms of this Order, the invoices and supporting time
9 records from such attorneys shall be included in FTI's own applications, both interim and final, and
10 they shall be subject to the approval of the Court pursuant to sections 330 and 331 of the Bankruptcy
11 Code.

12 5. All compensation previously paid shall be subject to review by the Court if any objection
13 is timely filed.

14 6. To the extent there is any inconsistency between the terms of this Order, the Application,
15 or the Star Declaration, the terms of this Order shall control.

16 7. All compensation and reimbursement due to, and other rights of FTI, including, without
17 limitation, indemnification obligations, shall be treated and allowed (subject to the compensation
18 review procedures identified in this Order) as administrative expenses in accordance with section 503
19 of the Bankruptcy Code.

20 8. In the event FTI or its affiliates are required by subpoena or other legal process to
21 produce any of their documents or their respective shareholders, members, managers, employees,
22 agents, representatives, or subcontractors as witnesses with respect to FTI's services for the Committee,
23 the Debtors will reimburse FTI for its professional time and expenses, as well as the fees and expenses
24 of FTI's counsel, incurred in responding to such requests.
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1 9. The Committee is authorized and empowered to take all actions necessary to implement
2 the relief granted in this Order.

3 10. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, or 9014, or
4 otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon
5 its entry.

6 11. This Court shall retain jurisdiction with respect to all matters arising from or related to
7 the implementation or interpretation of this Order. During the pendency of these Chapter 11 Cases,
8 this Court retains jurisdiction with respect to all matters arising from or related to the implementation
9 of this Order.
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11 **END OF ORDER**
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Exhibit B

(Declaration of Samuel E. Star)

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1 Dennis F. Dunne (admitted *pro hac vice*)
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17 *Proposed Counsel for the Official Committee*
18 *of Unsecured Creditors*

19 **UNITED STATES BANKRUPTCY COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN FRANCISCO DIVISION**

22 **In re:**

23 **PG&E CORPORATION,**

24 **-and-**

25 **PACIFIC GAS AND ELECTRIC**
26 **COMPANY,**

27 **Debtors.**

- 28 ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the lead case,
No. 19-30088(DM)

No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF SAMUEL E. STAR
IN SUPPORT OF APPLICATION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ENTRY
OF AN ORDER PURSUANT TO 11 U.S.C.
§§328(A) AND 1103 AND FED. R. BANKR.
P. 2014(A) FOR AUTHORIZATION TO
RETAIN AND EMPLOY FTI
CONSULTING, INC. AS FINANCIAL
ADVISOR NUNC PRO TUNC TO
FEBRUARY 12, 2019**

Dated: April 24, 2019
Time: 9:30AM Pacific Time
Place: United State Bankruptcy Court,
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Samuel E. Star, pursuant to 28 U.S.C. § 1746, to the best of my knowledge and belief, and
2 after reasonable inquiry, declare that the following is true and correct:

3 I am a Senior Managing Director of FTI Consulting, Inc. (together with its wholly owned
4 subsidiaries, contractors and employees, “**FTI**”), an independent global business advisory firm. I am
5 duly authorized to make this declaration (the “**Declaration**”) on behalf of FTI and submit this
6 Declaration in support of the *Application of the Official Committee of Unsecured Creditors for Entry*
7 *of an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R. Bankr. P. 2014(a) for Authorization*
8 *to Retain and Employ FTI Consulting, Inc. as Financial Advisors Nunc Pro Tunc* to February 12, 2019
9 (the “**Application**”),¹ which was filed by the Official Committee of Unsecured Creditors (the
10 “**Committee**”) in these chapter 11 cases (the “**Chapter 11 Cases**”) of the above captioned debtors and
11 debtors in possession (collectively, the “**Debtors**”). Unless otherwise stated in this declaration, I
12 generally have personal knowledge of the matters set forth herein, however, certain of the disclosures
13 set forth herein are related to matters within the knowledge of other employees at FTI and are based on
14 information provided by them. If called as a witness, I would testify thereto.
15
16

17 **A. QUALIFICATIONS**

18 1. FTI is a global advisory firm which, through its five practice groups and affiliated
19 entities, and its nearly 4,600 employees in twenty-eight countries, provides a variety of services to third
20 parties including by way of example and not limitation, Forensic and Litigation Consulting,
21 Technology Services, Corporate Finance/Restructuring, Economic Consulting and Strategic
22 Communications. FTI’s clients include many of the world’s largest companies, as well as a majority
23 of the ten largest bank holding companies and nearly all of the top one hundred law firms in the world.
24 Within the Corporate Finance/Restructuring business segment, FTI’s expertise includes liquidity and
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¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Application.

1 capital structure assessment, debt and equity restructuring advice and identification of reorganization
2 alternatives.

3 2. FTI has advised management, senior lenders, and unsecured creditors in numerous
4 significant restructurings and turnarounds in recent years, including *In re Energy Future Holdings*
5 *Corp., et al.*; *In re FirstEnergy Solutions Corp., et al.*; *In re iHeartMedia, Inc., et al.*; *In re Cenveo,*
6 *Inc. et al.*; *In re Sears Holding Corporation, et al.*; *In re Westmorland Coal Company, et al.*; *In re*
7 *Pacific Exploration & Production*; *In re R.E. Gas Development, LLC (Rex Energy), et al.*; *In re The*
8 *Weinstein Company Holdings LLC*; *In re Claire's Stores, Inc., et al.*; *In re Ultra Petroleum*
9 *Corporation, et al.*; *In re Peabody Energy Corporation, et al.*; *In re Premier Oil & Gas, Inc., et al.* and
10 the restructuring of the Commonwealth of Puerto Rico among others. FTI has a wealth of experience
11 in restructuring and financial advisory services and enjoys an excellent reputation for services rendered
12 in large and complex chapter 11 cases on behalf of debtors and creditors throughout the United States.
13

14 3. In preparing to advise the Committee, not only does FTI have extensive experience in
15 comparable restructuring matters, but it has become familiar with the Debtors' businesses, financial
16 affairs, and capital structure. Since its engagement, FTI has worked closely with the Committee and
17 its professionals in assisting with the myriad requirements of these Chapter 11 Cases. Accordingly, the
18 Committee believes that FTI has developed substantial relevant experience regarding the Debtors and
19 the circumstances of these Chapter 11 Cases. For these reasons, I believe that FTI is particularly
20 qualified and uniquely suited to deal effectively and efficiently with matters that may arise in the
21 context of these Chapter 11 Cases.
22

23
24 **B. SCOPE OF SERVICES**

25 4. As set forth in the Application, FTI has been providing and will continue to
26 perform the following services, with the goal of assisting the Committee to maximize value for all
27 constituents. Among other things, FTI has provided, or will provide on a prospective basis upon the
28 court's approval of this Application, services in the following categories (the "Services"):

- 1 (a) Assistance in the review of financial related disclosures required by the Court,
2 including the Schedules of Assets and Liabilities, the Statement of Financial
3 Affairs and Monthly Operating Reports;
- 4 (b) Assistance with the assessment and monitoring of the Debtors' short-term cash
5 flow, liquidity, and operating results;
- 6 (c) Assistance with the review of the Debtors' proposed motions or requests for
7 relief, including the Debtors' proposed operational integrity supplier, cash
8 management, customer program, key employee incentive/retention and other
9 employee benefit programs motions;
- 10 (d) Assistance with the review of the Debtors' long-term financial projections,
11 including cash generating capacity and identification of potential cost savings,
12 including overhead and operating expense reductions and efficiency
13 improvements;
- 14 (e) Assistance with the review of the Debtors' cost/benefit analysis with respect to
15 the affirmation or rejection of various executory contracts and leases;
- 16 (f) Assistance with the review of the Debtors' corporate structure including analysis
17 of intercompany activities and claims;
- 18 (g) Assistance with the review of any tax issues associated with, but not limited to,
19 claims/stock trading, preservation of net operating losses, refunds due to the
20 Debtors, plans of reorganization, and asset sales;
- 21 (h) Assistance in the review of the claims reconciliation and estimation process,
22 including potential exposure from wildfire damage claims;
- 23 (i) Assistance in the development of communications strategies with various
24 stakeholders including regulatory agencies and state government officials and
25 commissions;
- 26 (j) Attendance at meetings and assistance in discussions with the Debtors, potential
27 investors, banks, other secured lenders, the Committee, and other official or
28 unofficial committees organized in these chapter 11 proceedings, the U.S.
Trustee, other parties in interest and professionals hired by the same, as
requested;
- (k) Assistance in the review and/or preparation of information and analysis
necessary for the confirmation of a plan and related disclosure statement in these
chapter 11 proceedings;
- (l) Assistance in the evaluation and analysis of avoidance actions, including
fraudulent conveyances and preferential transfers;
- (m) Assistance in the prosecution of Committee responses/objections to the Debtors'
motions, including attendance at deposition and provision of expert
reports/testimony on case issues as required by the Committee; and

- 1 (n) Render such other general business consulting or such other assistance as the
2 Committee or its counsel may deem necessary that are consistent with the role
3 of a financial advisor and not duplicative of services provided by other
4 professionals in this proceeding.

5 **C. NO DUPLICATION OF SERVICES**

6 5. In addition, the Committee will retain the services of other professionals over
7 the course of these Chapter 11 Cases. Already, the Committee has retained Centerview Partners LLC
8 (“Centerview”) as investment banker and Milbank LLP (“Milbank”) as counsel. The services
9 provided by Centerview will focus on financing alternatives, including economics of post-petition and
10 exit financing, enterprise valuation, asset sales assessments, strategic alternative and post-emergence
11 capital structure issues. Milbank will provide legal counsel as the attorneys to the Committee.

12 6. The Committee and FTI intend that all of the services that FTI will provide to
13 the Committee will be appropriately directed by the Committee so as to avoid duplication of efforts
14 among the other professionals retained in these Chapter 11 Cases and performed in accordance with
15 applicable standards of the profession. FTI will work closely with the Committee’s other retained
16 professionals to prevent any duplication of efforts in the course of advising the Committee.
17 Accordingly, I believe that the services to be provided by FTI will complement any services provided
18 by the Committee’s other professionals.

19 **D. TERMS OF RETENTION**

20 7. Other than as set forth herein, neither I nor FTI, nor any professional associated
21 with FTI, has been engaged by any entity other than the Committee in connection with these Chapter
22 11 Cases. FTI is not owed any prepetition fees or expenses related to the Committee assignment. It is
23 possible that FTI is owed money on account of prepetition fees or expenses in matters involving the
24 Debtors but unrelated to these Chapter 11 Cases. To the extent any money is owed by the Debtors on
25 account of prepetition fees or expenses, FTI will waive such amounts so that it is not a creditor of the
26 Debtors.
27
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1 8. Subject to approval by the Court, the Committee proposes to employ and retain
2 FTI to serve as the Committee's financial advisor on the following terms:

3 (a) The customary hourly rates, subject to periodic adjustments, charged by FTI
4 professionals anticipated to be assigned to these cases are as follows:

5 Senior Managing Directors	\$725 – \$1,260
6 Directors / Senior Directors / Managing Directors	\$510 – \$880
7 Consultants/Senior Consultants	\$310 – \$640
8 Administrative / Paraprofessionals	\$125 – \$275

9 (b) Reimbursement of actual, necessary costs and expenses incurred in connection
10 with the rendering of its services in these Chapter 11 Cases, including fees and
11 expenses of attorneys engaged in connection with retention or fee applications;
12 and
13

14 (c) Indemnification on the terms described below.

15 9. FTI intends to apply for compensation for professional services rendered and
16 reimbursement of expenses incurred in connection with these Chapter 11 Cases, subject to the Court's
17 approval and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules,
18 the Local Rules, the U.S. Trustee Guidelines, and any other applicable procedures and orders of the
19 Court, including any order approving the Application (to the extent compliance is not waived).
20

21 10. FTI will maintain records in support of any actual, necessary costs and
22 expenses incurred in connection with the rendering of its services in these Chapter 11 Cases. In the
23 event FTI seeks reimbursement for attorneys' fees during the term of the Chapter 11 Cases, FTI will
24 include the applicable invoices and supporting time records from such attorneys (in summary form and
25 redacted for privilege and work product). Such attorneys do not need to have been retained under
26 section 327 of the Bankruptcy Code.
27
28

1 11. In addition to the foregoing, and as a material part of the consideration for the
2 agreement of FTI to furnish services to the Committee pursuant to the terms of the Application, FTI
3 believes that the following indemnification terms are customary and reasonable for creditors'
4 committee financial advisors in chapter 11 cases:

- 5 a. subject to the provisions of subparagraphs (b) and (c) below and approval of the Court,
6 the Debtors are authorized to indemnify, and shall indemnify, FTI for any claims
7 arising from, related to, or in connection with FTI's engagement under this
8 Application, but not for any claim arising from, related to, or in connection with FTI's
9 post-petition performance of any other services other than those in connection with the
10 engagement, unless such post-petition services and indemnification therefore are
11 approved by this Court; and
12
13 b. the Debtors shall have no obligation to indemnify FTI for any claim or expense that is
14 either (i) judicially determined (the determination having become final) to have arisen
15 primarily from FTI's gross negligence, willful misconduct or fraud unless the Court
16 determines that indemnification would be permissible pursuant to *In re United Artists*
17 *Theatre company, et al.*, 315 F.3d 217 (3d Cir. 2003), or (ii) settled prior to a judicial
18 determination as to FTI's gross negligence, willful misconduct or fraud, but
19 determined by this Court, after notice and a hearing, to be a claim or expense for
20 which FTI is not entitled to receive indemnity under the terms of the Application; and
21
22 c. if, before the earlier of (i) the entry of an order confirming a chapter 11 plan in these
23 cases (that order having become a final order no longer subject to appeal), and (ii) the
24 entry of an order closing these chapter 11 cases, FTI believes that it is entitled to the
25 payment of any amounts by the Debtors on account of the Debtors' indemnification
26 obligations under the Application, including, without limitation, the advancement of
27 defense costs, FTI must file an application in this Court, and the Debtors may not pay
28

1 any such amounts to FTI before the entry of an order by this Court approving the
2 payment. This subparagraph (c) is intended only to specify the period of time under
3 which the Court shall have jurisdiction over any request for fees and expenses by FTI
4 for indemnification, and not as a provision limiting the duration of the Debtors'
5 obligation to indemnify FTI.

6 12. I believe that the compensation structure, including the provision of
7 indemnification, is reasonable and comparable to those generally charged by financial advisors and
8 consultants of similar stature to FTI for comparable engagements, both in and out of chapter 11.
9

10 13. To the best of my knowledge, and unless otherwise set forth herein, (a) no
11 commitments have been made or received by FTI with respect to compensation or payment in
12 connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy
13 Code and (b) FTI has no agreement with any other entity to share with such entity any compensation
14 received by FTI in connection with this engagement in these Chapter 11 Cases.
15

16 **E. Disinterestedness**

17 14. In connection with the preparation of this Declaration, FTI requested and
18 obtained from the Debtors' proposed counsel a list of interested parties and significant creditors in these
19 Chapter 11 Cases (collectively, the "**Potential Parties in Interest**"). A list summarizing the Potential
20 Parties in Interest is reflected on **Schedule A** attached hereto. The number of Potential Parties in
21 Interest exceeded 9,000 separate parties.

22 15. FTI then compared the names of each of the Potential Parties in Interest to the
23 names contained in a database of current and former clients and other relationships (the "**Client**
24 **Database**"). The Client Database generally includes: (i) the name of each client of FTI; (ii) the name
25 of each party who is or was known to be adverse to such client of FTI in connection with the matter in
26 which FTI is or was engaged for such client; (iii) the name of each party that has, or had, a substantial
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1 role with regard to the subject matter of FTI's retention; and (iv) the names of FTI professionals who
2 are, or were, primarily responsible for matters for such clients.

3 16. In addition, an email was issued to all managing directors and senior managing
4 directors of FTI, requesting disclosure of information regarding: (i) any known personal or professional
5 connections between the respondent and/or FTI on the one hand, and the Debtors and/or its affiliates,
6 on the other hand;² (ii) any known representations by the respondent and/or FTI of any of the Debtors
7 and/or its affiliates in any matter; and (iii) any other conflict or reason why FTI may be unable to
8 represent the Committee in the Chapter 11 Cases.
9

10 17. A listing of any relationship between FTI and the Debtors and/or their affiliates
11 during the past five (5) years is set forth on **Schedule B** to this Declaration. A listing of any relationship
12 between FTI and any other Potential Parties in Interest is set forth on **Schedule C** to this Declaration.
13 This initial list includes the Debtors, their affiliates and subsidiaries, their current and former directors
14 and officers, including their affiliations, the Debtors' professionals, their lenders and administrative
15 agents, their insurance providers, their DIP lenders, their top unsecured creditors, material contract
16 counterparties, their significant shareholders and holders of unsecured notes, the unions, certain
17 litigants, regulatory and government agencies, members of the Committee, members of the Official
18 Tort Claimants Committee and its professionals (and individual member professionals), members of
19 the various *ad hoc* groups, including their professionals, and employees of the Office of the Governor
20 of California and its advisors, the office of the United States Trustee for Region 17 and the Bankruptcy
21 Court.
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26 ² In reviewing its records and the relationships of its professionals, FTI did not seek information as to whether any
27 FTI professional or member of his/her immediate family: (a) indirectly owns, through a public mutual fund or through
28 partnerships in which certain FTI professionals have invested but as to which such professionals have no control over or
knowledge of investment decisions, securities of the Debtors or any other party in interest; or (b) has engaged in any ordinary
course consumer transaction with the Debtors or any party in interest. If any such relationship does exist, it does not impact
FTI's disinterestedness or otherwise give rise to a finding that FTI holds or represents an interest adverse to the Debtors'
estates.

1 18. To the best of my knowledge, information, and belief, and based on the
2 foregoing inquiry, other than in connection with this engagement and as otherwise disclosed in this
3 Declaration or as set forth in **Schedule B** or **Schedule C**, FTI has no relationships or connections with
4 the Debtors or their affiliates of which I am aware. In addition, to the best of my knowledge,
5 information, and belief, neither I nor any other professional of FTI who is working on this engagement:

6 (a) is a creditor, equity security holder, or insider of the Debtors;

7 (b) is or has been within two years before the Petition Date, a director, officer, or
8 employee of the Debtors; or
9

10 (c) has any interest materially adverse to the interests of the Debtors' estates, by
11 reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or
12 for any other reason.

13 19. I am not related or connected to and, to the best of my knowledge, information,
14 and belief, no other professional of FTI who is working on this engagement is related or connected to,
15 any United States Bankruptcy Judge for the Northern District of California, or any employee in the
16 Office of the United States Trustee overseeing these Chapter 11 Cases.
17

18 20. As set forth in further detail herein, FTI is a global business advisory firm. As
19 can be expected with respect to any international professional services firm such as FTI, FTI provides
20 a wide range of services to many clients, which may include one or more entities with interests in these
21 Chapter 11 Cases. To the best of my knowledge, FTI's services for such clients do not relate to these
22 Chapter 11 Cases except as stated below.
23

24 21. In addition to the relationships disclosed on **Schedule B**, I note that:

25 (a) Prior to the Petition Date, Compass Lexecon, LLC ("**Compass**
26 **Lexecon**"), a wholly-owned subsidiary of FTI that provides economic
27 consulting services, was engaged by the Debtors, through its counsel, to
28 provide consulting services to assess and develop a methodology to evaluate

1 potential damages related to the California wildfires (the “**Compass Lexecon**
2 **Engagement**”). Based upon information provided to FTI, it is likely that the
3 Debtors will seek further advice from Compass Lexecon on these matters.
4 Compass Lexecon operates separately from FTI, with separate management
5 and employees. In most locations, FTI and Compass Lexecon work out of
6 separate office locations.

7
8 (b) Prior to the Petition Date, the Environmental Solutions practice group of
9 the Forensic & Litigation Consulting business segment was retained by
10 counsel for a group of over fifty defendants including the Debtors to provide
11 analysis of post-closure obligations relating to a landfill site, including
12 forensic historical research and development of a database to assist in the
13 calculation of cost allocations among the defendants (the “**Environmental**
14 **Solutions Engagement**”). The fees for the Environmental Solutions
15 Engagement are paid by the independent trust and allocated among each of
16 the defendants. Based upon information provided to FTI, work may continue
17 on the Environmental Solutions Engagement.
18

19 22. In addition to the relationships disclosed on **Schedule C**, I note that:

20 (a) Prior to the Petition Date, the insurance practice group of the Forensic &
21 Litigation Consulting business segment was retained by a purchaser of
22 insurance subrogation claims to assist in connection with certain US
23 insurance companies holding subrogation claims primarily related to the
24 identification of and introduction to insurers, which assistance does not
25 include making any assessment regarding the claims, their value or their
26 underlying validity (the “**Subrogation Engagement**”). The subrogation
27
28

claims include claims against the Debtors. Based upon information provided to FTI, work is likely to continue on the Subrogation Engagement.

(b) Prior to the Petition Date, Forensic & Litigation Consulting, a business segment of FTI, was retained by counsel to provide litigation support to Tiger Natural Gas, Inc., in a dispute over billing, collection and payment against the Debtors. (the “**Tiger Engagement**”). Based upon information provided to FTI, work may continue on the Tiger Engagement.

23. In order to maintain the confidentiality of the client information in connection with FTI’s engagement on behalf of the Committee (the “**FTI Committee Engagement**”), FTI will protect the client information through the use of its Ethical Wall procedures. In conjunction with the foregoing, FTI has established and will maintain the following internal procedures: (i) each FTI professional on the FTI Committee Engagement (“**FTI Committee Professionals**”), the Compass Lexecon Engagement (“**FTI Compass Lexecon Professionals**”), the Environmental Solutions Engagement (“**FTI Environmental Solutions Professionals**”), the Subrogation Engagement (the “**FTI Subrogation Professionals**”) and the Tiger Engagement (the “**FTI Tiger Professionals**”) shall acknowledge in writing that he or she may receive certain nonpublic information and that he or she is aware of the information wall in effect and will follow the information wall procedures therein; (ii) FTI Committee Professionals will not directly or indirectly share any nonpublic information generated by, received from or relating to Committee activities or Committee membership with FTI Lexecon Professionals, FTI Environmental Solutions Professionals, FTI Subrogation Professionals and FTI Tiger Professionals, and FTI Compass Lexecon Professionals, FTI Environmental Solutions Professionals, FTI Subrogation Professionals and FTI Tiger Professionals will not directly or indirectly share any nonpublic information generated by, received from or relating to the Compass Lexecon Engagement, the Environmental Solutions Engagement, the Subrogation Engagement or the Tiger Engagement with FTI Committee Professionals, except that a good-faith communication of

1 publicly available information shall not be presumed to be a breach of the obligations of FTI or any
2 FTI Committee Professionals or FTI Compass Lexecon Professionals, FTI Environmental Solutions
3 Professionals, FTI Subrogation Professionals or FTI Tiger Professionals under such information wall
4 procedures; (iii) FTI is setting up electronic internal security walls to ensure that only FTI employees
5 involved directly with or working on the FTI Committee Engagement may have access to the
6 information, databases, e-mails, schedules or any other information relating to that engagement; (iv)
7 FTI shall periodically monitor, consistent with its ordinary course practice, compliance with these
8 protocols and ethical wall procedures among FTI Committee Professionals, FTI Compass Lexecon
9 Professionals, FTI Environmental Solutions Professionals, FTI Subrogation Professionals and FTI
10 Tiger Professionals to ensure that such exchanges are performed in a manner consistent with the
11 information wall procedures; and (v) FTI shall immediately disclose to Committee counsel and the
12 United States Trustee any material breaches of the procedures described herein. If FTI ceases to act
13 as advisor to the Committee, it will continue to follow the procedures set forth above until a plan has
14 been confirmed in the Debtors' Chapter 11 Cases or the Chapter 11 Cases have been converted or
15 dismissed.
16
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18 24. By way of further disclosure:

19 (a) From time to time, FTI, which is providing the services in these Chapter
20 11 Cases, has provided services, and likely will continue to provide services to certain attorneys,
21 professionals, creditors (including lenders) and/or security holders of the Debtors and various
22 other parties, some of whom may be providing services to, or may be adverse to, or may be
23 otherwise connected to, the Debtors, in each case in matters unrelated to these Chapter 11 Cases.
24

25 (b) FTI is engaged in providing various consulting services through five
26 business segments: Corporate Finance & Restructuring, Economic Consulting, Forensic &
27 Litigation Consulting, Strategic Communications and Technology services globally to a wide
28 range of institutions and individuals and may in the past have had, and may currently or in the

1 future have, financial advisory or other investment banking or consulting relationships with
2 parties that may have interests with respect to the Debtors or members of the Committee. Each
3 of the FTI's five business segments is separate and distinct from the other, with separate
4 employees and management. Compass Lexecon is a wholly-owned subsidiary of FTI that
5 provides economic consulting services, and operates separately from FTI, with separate
6 management and employees. In most locations, FTI and Compass Lexecon work out of separate
7 office locations.

8
9 (c) In the ordinary course of business, investment funds in which FTI's
10 employees may have financial interests, but over whose investment decisions such employees
11 have no input or control, may acquire, hold or sell, long or short positions, or trade or otherwise
12 effect transactions, in debt, equity, and other securities and financial instruments (including
13 bank loans and other obligations) of, or investments in, the Debtors or other parties that may
14 have an interest in these Chapter 11 Cases or have other relationships with such parties. With
15 respect to any such securities, financial instruments, and/or investments, all rights in respect of
16 such securities, financial instruments, and investments, including any voting rights, will be
17 exercised by the holder of the rights, in its sole discretion. Moreover, the FTI Committee
18 Professionals are subject to compliance mechanisms and policies and procedures designed to
19 prevent confidential, non-public information from being improperly shared.

20
21 (d) In the ordinary course of its business, FTI from time to time discusses
22 issues concerning stressed and distressed companies with creditors and prospective creditors
23 that are clients of the firm, or that otherwise contact FTI, or that are referred to the firm in light
24 of FTI's reputation for covering such companies and/or relevant industry expertise. At the time
25 of those contacts, it is not known whether any particular company will actually file for
26 bankruptcy, or if any of these creditors and/or potential creditors will serve on any future
27 creditors' committee, or even be a creditor of the relevant estate in the event of a future
28

1 bankruptcy. It is also FTI's customary practice to communicate with and, when appropriate or
2 requested, send materials to one, or more, of the unsecured creditors identified by a debtor and
3 who are, therefore, potential members of a creditors' committee, if we either know, work with,
4 are contacted by, or are otherwise referred to the relevant creditor. In some circumstances, we
5 may contact potential committee members with whom we are not previously familiar.

6 (e) FTI personnel may have business associations with certain creditors of
7 the Debtors or counsel or other professionals involved in these Chapter 11 Cases on matters
8 unrelated to these Chapter 11 Cases. In addition, in the ordinary course of its business, FTI
9 may engage counsel or other professionals in unrelated matters who now represent, or in the
10 future may represent, creditors or other interested parties in these Chapter 11 Cases.
11

12 25. Given the large number of parties in interest in these Chapter 11 Cases, despite
13 the efforts described above to identify and disclose FTI's relationships with parties in interest in these
14 Chapter 11 Cases, FTI is unable to state with complete certainty that every client relationship or other
15 connection has been disclosed. In particular, among other things, FTI may have relationships with
16 persons who are beneficial owners of parties in interest and persons whose beneficial owners include
17 parties in interest or persons who otherwise have relationships with parties in interest.
18

19 26. As these Chapter 11 Cases progress, new parties may become parties in interest
20 and similarly, FTI may have been engaged, may currently be engaged and may in the future be engaged
21 by such new parties in interest in matters unrelated to these Chapter 11 Cases. Also, FTI may have
22 engaged or had mutual clients with, may have a current engagement or have mutual clients with and
23 may in the future engage or have mutual clients with certain law firms, financial advisors, accounting
24 firms, or other professionals that are Potential Parties in Interest or may become parties in interest, all
25 in matters unrelated to these cases. In addition, FTI may have also been engaged by, be currently
26 engaged by, or in the future be engaged by persons who are creditors or shareholders of the Debtors
27 and/or the members of the Committee, otherwise have a business relationship with the Debtors and/or
28

1 the Committee, or who are competitors of or customers of the Debtors and/or the Committee. Potential
2 Parties in Interest, persons that may become parties in interest in these Chapter 11 Cases, and persons
3 that have business relationships with the Debtors and/or the Committee, that are competitors of the
4 Debtors and/or the Committee, or that are customers of the Debtors and/or the Committee, may be: (a)
5 parties in interest in other bankruptcy cases where FTI is engaged or (b) may be affiliates of or creditors
6 of persons who may have engaged, have currently engaged, or may in the future engage FTI. In the
7 ordinary course of its business, FTI may also purchase services or products from Potential Parties in
8 Interest and other persons that are or may become parties in interest in these Chapter 11 Cases.
9 Moreover, FTI's employees may have relationships with persons that may become parties in interest
10 in these Chapter 11 Cases, and/or persons that have business relationships with the Debtors, are
11 competitors of the Debtors or that are customers of the Debtors. Continued inquiry will be made on a
12 periodic basis, with additional disclosures to this Court if necessary or otherwise appropriate.
13

14 27. To the best of my knowledge, information, and belief, some of FTI's employees
15 may have, or may in the future have, personal investment in funds, or other investment vehicles, over
16 whose investment decisions such employees have no input or control. Such entities may have made,
17 or may in the future make, investment in the claims or securities of the Debtors, or those of their
18 creditors, or other parties in interest in these Chapter 11 Cases.
19

20 28. Based on all of the foregoing, to the best of my knowledge and except as noted
21 above, FTI does not hold or represent any interest adverse to the estate, and therefore believes it is
22 eligible to represent the Committee under Bankruptcy Code section 1103(b). It is FTI's policy and
23 intent to update and expand its ongoing relationship search for additional parties in interest in an
24 expedient manner. To the extent FTI discovers any new material relevant facts bearing on the matters
25 described herein during the period of FTI's employment, FTI will amend and supplement the
26 information contained in this Declaration to disclose any additional facts and will promptly file a
27 Bankruptcy Rule 2014(a) Supplemental Declaration.
28

1 **F. COMPLIANCE WITH LAW**

2 29. I am generally familiar with the Bankruptcy Code and the Bankruptcy Rules,
3 and FTI will comply with them, subject to the Orders of this Court.

4 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
5 correct.

6 Dated: April 2, 2019
7 New York, NY

Respectfully submitted,

8 By: /s/ Samuel E Star
9 Samuel E. Star
10 Senior Managing Director

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Schedule A

(Interested Parties)

- Debtors
- Debtors' Trade Names and Aliases (up to 8 years)
- Affiliates and Subsidiaries
- Bank Accounts
- Bankruptcy Judges & Staff Northern District of California
- Current Officers and Directors
- Term and Revolving Loan Lenders and Administrative Agents
- Contract Counterparties
- DIP Lenders
- Debtors Professionals
- Former Officers and Directors (since 2008)
- Affiliations of Former Officers
- Affiliations of Former Directors
- Insurance/Insurance Provider/Surety Bonds
- Surety Bonds
- Landlords and parties to leases
- Lenders Litigation Counterparties/Litigation Pending Lawsuits
- Litigation Parties (in adversary proceeding 19-03003)
- Ad Hoc Committee of Unsecured Tort Claimant Creditors
- Non-Debtors Professionals
- Ordinary Course Professionals
- Letters of Credit
- Regulatory and Government
- Significant Competitors
- Significant Shareholders (more than 5% of equity)
- Significant holder of voting securities
- Taxing Authorities
- Top Unsecured Creditors (top 50 list as well as other large holders of unsecured claims)
- Unsecured Notes
- UCC Lien Holders
- Unions
- Office of the United States Trustee for Region 17
- Utility Providers
- Vendors/Suppliers
- Interested Parties / Notice of Appearance Parties

Schedule B

(Relationships With Debtors)

Party in Interest	Entity with which FTI has a connection	Nature of connection
PG&E Corporation	PG&E Corporation	<p>PG&E Corporation is a current client of Compass Lexecon in matters related to the assessment of, and methodology for evaluating potential damages relating to the California wildfires.</p> <p>PG&E Corporation is a former client of FTI's Strategic Communications business segment in matters unrelated to these Chapter 11 Cases, which matters were closed in 2016.</p> <p>PG&E Corporation is a former client of FTI's Forensic & Litigation Consulting business segment in matters unrelated to these Chapter 11 Cases, which matters were completed in 2010, 2011, and 2017.</p>

Pacific Gas & Electric Company	Pacific Gas & Electric Company	<p>Pacific Gas & Electric Company is a current client of Compass Lexecon in matters related to the assessment of, and methodology for evaluating potential damages relating to the California wildfires.</p> <p>Pacific Gas & Electric Company is a current client of the Environmental Solutions practice group of the Forensic & Litigation Consulting business segment in matters related to forensic historical research and development of a database to assist in the calculation of cost allocations related to a landfill site.</p> <p>Pacific Gas & Electric Company is a former client of FTI's Forensic & Litigation Consulting business segment in matters unrelated to these Chapter 11 Cases, which matters were completed in 2011 and 2017.</p>
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Schedule C

(Relationships With Potential Parties in Interest)

Party in Interest	Entity with which FTI has a connection	Nature of connection
7-Eleven	7-Eleven	7-Eleven is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
8minutenergy Renewables	8minutenergy Renewables	8minutenergy Renewables is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ABB Inc.	ABB Inc.	ABB Inc. is a former client of one or more business units of FTI in matters involving one or more of the Debtors but unrelated to these Chapter 11 Cases.
ABM Industries	ABM Industries	ABM Industries is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Acciona Energy N.A.	Acciona Energy N.A.	Acciona Energy N.A. is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ACCO Engineered Systems	ACCO Engineered Systems	ACCO Engineered Systems is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ACE American Insurance Company	ACE American Insurance Company	ACE American Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Ace Insurance Company	Ace Insurance Company	Ace Insurance Company is a current client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
ADP	ADP	ADP is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
AECOM Technical Services	AECOM Technical Services	AECOM Technical Services is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Aerojet	Aerojet	Aerojet is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Aetna	Aetna	Aetna is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Aetna International	Aetna International	Aetna International is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
AIG Europe Limited	AIG Europe Limited	AIG Europe Limited is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
AIG Property Casualty Company	AIG Property Casualty Company	AIG Property Casualty Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Akin Gump Strauss Hadley & Feld	Akin Gump Strauss Hadley & Feld	Akin Gump Strauss Hadley & Feld is a current client of one

Party in Interest	Entity with which FTI has a connection	Nature of connection
		or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
AlixPartners	AlixPartners	AlixPartners is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Allegheny Energy Supply Co, LLC	Allegheny Energy Supply Co, LLC	Allegheny Energy Supply Co, LLC is a former client of one or more business units of FTI in matters adverse to one or more of the Debtors, but unrelated to these Chapter 11 Cases.
Allianz Global Risks US Insurance Company	Allianz Global Risks US Insurance Company	Allianz Global Risks US Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Allied World Assurance Company	Allied World Assurance Company	Allied World Assurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Allstate Insurance Company	Allstate Insurance Company	Allstate Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
American Air Filter Company	American Air Filter Company	American Air Filter Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
American Energy	American Energy	American Energy is a former client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to the Debtors and these Chapter 11 Cases.
American Insurance Company	American Insurance Company	American Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
American International Group (AIG)	American International Group (AIG)	American International Group (AIG) is a current client of one or more business units of FTI in matters involving one or more of the Debtors but unrelated to these Chapter 11 Cases.
American International Reinsurance Company	American International Reinsurance Company	American International Reinsurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
American Zurich Insurance Company	American Zurich Insurance Company	The American Zurich Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Anadarko	Anadarko	Anadarko is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Ankura	Ankura	Ankura is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Anthem Blue Cross	Anthem Blue Cross	Anthem Blue Cross is a current client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
Apache	Apache	Apache is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Apollo	Apollo	Apollo is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
APTIM	APTIM	APTIM is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ARB Inc.	ARB Inc.	ARB Inc. is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Arch Insurance Company	Arch Insurance Company	Arch Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Arch Insurance Company (Europe)	Arch Insurance Company (Europe)	Arch Insurance Company (Europe) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Arch Reinsurance	Arch Reinsurance	Arch Reinsurance is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Archer Norris	Archer Norris	Archer Norris is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Arent Fox	Arent Fox	Arent Fox is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Arnold & Porter Kaye Scholer	Arnold & Porter Kaye Scholer	Arnold & Porter Kaye Scholer is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ARRIS Group, Inc.	ARRIS Group, Inc.	ARRIS Group, Inc. is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Aspen Insurance Company	Aspen Insurance Company	Aspen Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Aspen Specialty Insurance Company	Aspen Specialty Insurance Company	Aspen Specialty Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
AT&T	AT&T	AT&T is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
AT&T Corporation	AT&T Corporation	AT&T Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
AT&T Mobility II	AT&T Mobility II	AT&T Mobility II is a former client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to the Debtors and these Chapter 11 Cases.
AT&T Network	AT&T Network	AT&T Network is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Atlantic Coast	Atlantic Coast	Atlantic Coast is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Atlantica Yield	Atlantica Yield	Atlantica Yield is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Atlas Copco	Atlas Copco	Atlas Copco is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Attestor Capital LLP	Attestor Capital LLP	Prior to the Petition Date, the insurance practice group of FTI's Forensic & Litigation Consulting business segment, was retained by the purchaser of insurance subrogation claims to assist in connection with certain US insurance companies holding subrogation claims, which claims may be against the Debtors.
Attorney General for the State of California (Xavier Becerra)	Attorney General for the State of California (Xavier Becerra)	Attorney General for the State of California (Xavier Becerra) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Avista Energy	Avista Energy	Avista Energy is a former client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		adverse to the Debtors but unrelated to these Chapter 11 Cases.
Avista Utilities	Avista Utilities	Avista Utilities is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
AXIS Insurance Company	AXIS Insurance Company	AXIS Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BakerCorp	BakerCorp	BakerCorp is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Baker Hostetler	Baker Hostetler	Baker Hostetler is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bank of America	Bank of America	Bank of America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bank of America Merrill Lynch	Bank of America Merrill Lynch	Bank of America Merrill Lynch is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bank of America, N.A.	Bank of America, N.A.	Bank of America, N.A. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bank of Montreal	Bank of Montreal	Bank of Montreal is a current client of one or more business

Party in Interest	Entity with which FTI has a connection	Nature of connection
		units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bank of New York Mellon	Bank of New York Mellon	Bank of New York Mellon is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Barclays Bank	Barclays Bank	Barclays Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Barclays Bank PLC	Barclays Bank PLC	Barclays Bank PLC is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Barclays Capital	Barclays Capital	Barclays Capital is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
John Barrie	John Barrie	John Barrie is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Baupost	Baupost	Baupost is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Baupost Group SSgA Funds Management	Baupost Group SSgA Funds Management	Baupost Group SSgA Funds Management is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BC Hydro	BC Hydro	BC Hydro is a former client of one or more business units of FTI in matters adverse to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors but unrelated to these Chapter 11 Cases.
Xavier Becerra	Xavier Becerra	Xavier Becerra is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Robert Bell	Robert Bell	Robert Bell is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Berkley Insurance Company	Berkley Insurance Company	Berkley Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Berkley Regional Insurance Company	Berkley Regional Insurance Company	Berkley Regional Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bigge Crane and Rigging Co.	Bigge Crane and Rigging Co.	Bigge Crane and Rigging Co. is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Black & Veatch Corporation	Black & Veatch Corporation	Black & Veatch Corporation is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BlackRock	BlackRock	BlackRock is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Blue Cross of California	Blue Cross of California	Blue Cross of California is a current client of one or more business units of FTI in

Party in Interest	Entity with which FTI has a connection	Nature of connection
		matters unrelated to the Debtors and these Chapter 11 Cases.
Blue Mountain Capital Management	Blue Mountain Capital Management	Blue Mountain Capital Management is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BlueMountain Capital Management	BlueMountain Capital Management	BlueMountain Capital Management is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BNP Paribas	BNP Paribas	BNP Paribas is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BNP Paribas Securities Corp.	BNP Paribas Securities Corp.	BNP Paribas Securities Corp. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BNP Paribas US	BNP Paribas US	BNP Paribas US is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bolttech-Mannings	Bolttech-Mannings	Bolttech-Mannings is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Boy Scouts of America	Boy Scouts of America	Boy Scouts of America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
BP Energy Company	BP Energy Company	BP Energy Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
BP Products North America	BP Products North America	BP Products North America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Bridgestone Corporation	Bridgestone Corporation	Bridgestone Corporation is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Michael Brooks	Michael Brooks	Michael Brooks is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Donald Brown	Donald Brown	Donald Brown is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
California Dept. of Water Resources	California Dept. of Water Resources	California Dept. of Water Resources is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
California Franchise Tax Board	California Franchise Tax Board	California Franchise Tax Board is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Calpine	Calpine	Calpine is a current client of one or more business units of FTI in matters unrelated to

Party in Interest	Entity with which FTI has a connection	Nature of connection
		the Debtors and these Chapter 11 Cases.
Calpine Corporation	Calpine Corporation	Calpine Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Caltrol	Caltrol	Caltrol is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Camacho	Camacho	Camacho is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Cameron International Corporation	Cameron International Corporation	Cameron International Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Canadian Imperial Bank of Commerce New York Branch	Canadian Imperial Bank of Commerce New York Branch	Canadian Imperial Bank of Commerce New York Branch is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Canon Solutions America	Canon Solutions America	Canon Solutions America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Cardinal	Cardinal	Cardinal is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Cardno	Cardno	Cardno is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Cargill	Cargill	Cargill is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pryor Cashman	Pryor Cashman	Pryor Cashman is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Centerbridge Partners	Centerbridge Partners	Centerbridge Partners is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Centerview	Centerview	Centerview is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Charter Communications	Charter Communications	Charter Communications is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Lida Chase	Lida Chase	Lida Chase is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Chevron Products Company	Chevron Products Company	Chevron Products Company is a current client of one or

Party in Interest	Entity with which FTI has a connection	Nature of connection
		more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Chevron USA, Inc.	Chevron USA, Inc.	Chevron USA, Inc. is a current client of FTI's Technology Consulting group in matters involving one or more of the Debtors as a co-defendant but unrelated to these Chapter 11 Cases.
Chevron	Chevron	Chevron is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving the Debtors.
Chrysler	Chrysler	Chrysler is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Chubb National Insurance Company	Chubb National Insurance Company	Chubb National Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Citi	Citi	Citi is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Citibank, N.A.	Citibank, N.A.	Citibank, N.A. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Citigroup	Citigroup	Citigroup is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Citigroup Global Markets	Citigroup Global Markets	Citigroup Global Markets is a current client of one or more

Party in Interest	Entity with which FTI has a connection	Nature of connection
		business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
City of Seattle	City of Seattle	City of Seattle is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Clearway Energy	Clearway Energy	Clearway Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Clearway Energy Group LLC	Clearway Energy Group LLC	Clearway Energy Group LLC is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
CNA Insurance Company	CNA Insurance Company	CNA Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Coastal Chemical Co.	Coastal Chemical Co.	Coastal Chemical Co. is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Coblentz Patch	Coblentz Patch	Coblentz Patch is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Cochrane	Cochrane	Cochrane is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Comcast	Comcast	Comcast is a current client of one or more business units of

Party in Interest	Entity with which FTI has a connection	Nature of connection
		FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Conoco Phillips Company	Conoco Phillips Company	Conoco Phillips Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Conocophillips	Conocophillips	Conocophillips is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Constellation Energy Group	Constellation Energy Group	Constellation Energy Group is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Constellation NewEnergy, Inc.	Constellation NewEnergy, Inc.	Constellation NewEnergy, Inc. is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
Cooley	Cooley	Cooley is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Cravath, Swaine & Moore	Cravath, Swaine & Moore	Cravath, Swaine & Moore is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Crown Energy Services, Inc.	Crown Energy Services, Inc.	Crown Energy Services, Inc. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
CSE Safeguard Insurance Company	CSE Safeguard Insurance Company	CSE Safeguard Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Danning, Gill, Diamond & Kollitz	Danning, Gill, Diamond & Kollitz	Danning, Gill, Diamond & Kollitz is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Davis Polk & Wardwell LLP	Davis Polk & Wardwell LLP	Davis Polk & Wardwell LLP is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
DE Shaw	DE Shaw	DE Shaw is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Dell Financial Services	Dell Financial Services	Dell Financial Services is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Deloitte & Touche	Deloitte & Touche	Deloitte & Touche is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Delta Tech Service, Inc.	Delta Tech Service, Inc.	Delta Tech Service, Inc. is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Dentons US LLP	Dentons US LLP	Dentons US LLP is a current client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to the Debtors and these Chapter 11 Cases.
Department of Labor	Department of Labor	Department of Labor is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Deutsche Bank National Trust Company	Deutsche Bank National Trust Company	Deutsche Bank National Trust Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Deutsche Bank Trust Company Americas	Deutsche Bank Trust Company Americas	Deutsche Bank Trust Company Americas is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Dinsmore & Shohl	Dinsmore & Shohl	Dinsmore & Shohl is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
DLA Piper (US)	DLA Piper (US)	DLA Piper (US) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Dow Chemical	Dow Chemical	Dow Chemical is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
DuPont	DuPont	DuPont is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Engagement, involving one or more of the Debtor.
Dynegy Marketing and Trade	Dynegy Marketing and Trade	Dynegy Marketing and Trade is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Dynegy Power	Dynegy Power	Dynegy Power is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
E & J Gallo Winery	E & J Gallo Winery	E & J Gallo Winery is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Eaton Corporation	Eaton Corporation	Eaton Corporation is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
EDF Renewable Energy	EDF Renewable Energy	EDF Renewable Energy is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Edison Electric Institute	Edison Electric Institute	Edison Electric Institute is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Edison Electric Institute (EEI)	Edison Electric Institute (EEI)	Edison Electric Institute (EEI) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Edison Electric Institute; Electric Power Research Institute	Edison Electric Institute; Electric Power Research Institute	Edison Electric Institute; Electric Power Research Institute is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Elliott Management	Elliott Management	Elliott Management is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Elliott Management Corporation	Elliott Management Corporation	Elliott Management Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Enbridge	Enbridge	Enbridge is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Encana Corporation	Encana Corporation	Encana Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Environmental Protection Agency	Environmental Protection Agency	Environmental Protection Agency is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
EOG Resources	EOG Resources	EOG Resources is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Equinix	Equinix	Equinix is a current client of one or more business units of FTI in matters unrelated to

Party in Interest	Entity with which FTI has a connection	Nature of connection
		the Debtors and these Chapter 11 Cases.
Eversheds Sutherland	Eversheds Sutherland	Eversheds Sutherland is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Evoqua Water Technologies	Evoqua Water Technologies	Evoqua Water Technologies was a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Evoqua Water Technologies	Evoqua Water Technologies	Evoqua Water Technologies is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Exelon Corporation	Exelon Corporation	Exelon Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Exelon Generation	Exelon Generation	Exelon Generation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Exelon Generation Company	Exelon Generation Company	Exelon Generation Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Extreme Plastics Plus	Extreme Plastics Plus	Extreme Plastics Plus is a former client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
Exponent	Exponent	Exponent is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ExxonMobil Corp.	ExxonMobil Corp.	ExxonMobil Corp. is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Farella Braun	Farella Braun	Farella Braun is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Farmers Insurance Company	Farmers Insurance Company	Farmers Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Federal Insurance Company	Federal Insurance Company	Federal Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases
Fire Insurance Exchange	Fire Insurance Exchange	Fire Insurance Exchange is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
First Reserve	First Reserve	First Reserve is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Jonathan Fishman	Jonathan Fishman	Jonathan Fishman is a current client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to the Debtors and these Chapter 11 Cases.
Fluor Corporation	Fluor Corporation	Fluor Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
FMC Corporation	FMC Corporation	FMC Corporation is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Ford Motor Company	Ford Motor Company	Ford Motor Company is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Frito-Lay	Frito-Lay	Frito-Lay is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Frontier Communications	Frontier Communications	Frontier Communications is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Frontier Communications of America	Frontier Communications of America	Frontier Communications of America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Gallo Glass	Gallo Glass	Gallo Glass is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.

Party in Interest	Entity with which FTI has a connection	Nature of connection
General Electric International	General Electric International	General Electric International is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Geo-Solutions Inc.	Geo-Solutions Inc.	Geo-Solutions Inc. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Georgia Pacific	Georgia Pacific	Georgia Pacific is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
GFI Brokers	GFI Brokers	GFI Brokers is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Glidden	Glidden	Glidden is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Goldman Sachs Bank USA	Goldman Sachs Bank USA	Goldman Sachs Bank USA is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Google	Google	Google is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Graphic Packaging International	Graphic Packaging International	Graphic Packaging International is a current client of one or more business

Party in Interest	Entity with which FTI has a connection	Nature of connection
		units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Great American Insurance Company	Great American Insurance Company	Great American Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Great West Life and Annuity Insurance Company	Great West Life and Annuity Insurance Company	Great West Life and Annuity Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Greenberg Traurig	Greenberg Traurig	Greenberg Traurig is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Hanson Bridgett	Hanson Bridgett	Hanson Bridgett is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
HART High-voltage Apparatus Repair & Testing Co.	HART High-voltage Apparatus Repair & Testing Co.	HART High-voltage Apparatus Repair & Testing Co. is a former client of one or more business segments of FTI in matters opposing the Debtors but unrelated to these Chapter 11 Cases.
Hartford Casualty Insurance Company	Hartford Casualty Insurance Company	Hartford Casualty Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Hawke McKeon & Sniscak LLP	Hawke McKeon & Sniscak LLP	Hawke McKeon & Sniscak LLP is a current client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
HD Supply	HD Supply	HD Supply is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Henkels & McCoy, Inc.	Henkels & McCoy, Inc.	Henkels & McCoy, Inc. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Hewlett Packard Inc.	Hewlett Packard Inc.	Hewlett Packard Inc. is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Holland & Knight	Holland & Knight	Holland & Knight is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Honeywell HPS, Honeywell International Inc.	Honeywell International Inc.	Honeywell International Inc. is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Hunton Andrews Kurth	Hunton Andrews Kurth	Hunton Andrews Kurth is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Iberdrola Renewables	Iberdrola Renewables	Iberdrola Renewables is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Icap	Icap	Icap is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Icap Capital Markets (Canada)	Icap Capital Markets (Canada)	Icap Capital Markets (Canada) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ICAP Energy	ICAP Energy	ICAP Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Illinois Union Insurance Company	Illinois Union Insurance Company	Illinois Union Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Infosys Limited	Infosys Limited	Infosys Limited is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Insituform Technologies	Insituform Technologies	Insituform Technologies is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Internal Revenue Service	Internal Revenue Service	Internal Revenue Service is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
International Brotherhood of Electrical Workers	International Brotherhood of Electrical Workers	International Brotherhood of Electrical Workers is a current client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
International Business Machines	International Business Machines	International Business Machines is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Invenergy Wind Development	Invenergy Wind Development	Invenergy Wind Development is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Irell & Manella	Irell & Manella	Irell & Manella is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Ironshore	Ironshore	Ironshore is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
IT International Landfill Trust	IT International Landfill Trust	IT International Landfill Trust is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
J.P. Morgan Securities	J.P. Morgan Securities	J.P. Morgan Securities is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Jackson Lewis	Jackson Lewis	Jackson Lewis is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Jenner & Block	Jenner & Block	Jenner & Block is a current client of one or more business

Party in Interest	Entity with which FTI has a connection	Nature of connection
		units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mark Johnson	Mark Johnson	Mark Johnson is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mark Johnson	Mark Johnson	Mark Johnson is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Johnson Controls	Johnson Controls	Johnson Controls is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mary Jones	Mary Jones	Mary Jones is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Jones Day	Jones Day	Jones Day is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
JP Morgan Securities	JP Morgan Securities	JP Morgan Securities is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
JPMorgan Chase Bank, N.A.	JPMorgan Chase Bank, N.A.	JPMorgan Chase Bank, N.A. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
J-W Power Company	J-W Power Company	J-W Power Company is a former client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
Kaiser Foundation Health Plan	Kaiser Foundation Health Plan	Kaiser Foundation Health Plan is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Peter Knight	Peter Knight	Peter Knight is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Kone	Kone	Kone is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Latham & Watkins	Latham & Watkins	Latham & Watkins is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Robert Lee	Robert Lee	Robert Lee is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Lehman Brothers	Lehman Brothers	Lehman Brothers is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Level 3 Communications	Level 3 Communications	Level 3 Communications is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Levin Richmond Terminal	Levin Richmond Terminal	Levin Richmond Terminal is a current client of one or more business units of FTI in the Environmental Solutions

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Engagement, involving one or more of the Debtor.
Lexington Insurance Company	Lexington Insurance Company	Lexington Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Liberty Mutual Fire Insurance Company	Liberty Mutual Fire Insurance Company	Liberty Mutual Fire Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Liberty Mutual Insurance Company	Liberty Mutual Insurance Company	Liberty Mutual Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Liberty Mutual Insurance Europe Limited	Liberty Mutual Insurance Europe Limited	Liberty Mutual Insurance Europe Limited is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mark Light	Mark Light	Mark Light is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Littler Mendelson	Littler Mendelson	Littler Mendelson is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Live Nation	Live Nation	Live Nation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Lloyd's of London	Lloyd's of London	Lloyd's of London is a current client of one or more business units of FTI in

Party in Interest	Entity with which FTI has a connection	Nature of connection
		matters unrelated to the Debtors and these Chapter 11 Cases.
Lloyds of London (various)	Lloyds of London (various)	Lloyds of London (various) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Lloyd's of London Syndicates	Lloyd's of London Syndicates	Lloyd's of London Syndicates is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Locke Lord	Locke Lord	Locke Lord is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Lockheed Martin Space Systems Co	Lockheed Martin Space Systems Co	Lockheed Martin Space Systems Co is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Robert Lowry	Robert Lowry	Robert Lowry is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Manatt Phelps	Manatt Phelps	Manatt Phelps is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Michael Martin	Michael Martin	Michael Martin is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Robert Martin	Robert Martin	Robert Martin is a current client of one or more business

Party in Interest	Entity with which FTI has a connection	Nature of connection
		units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mayer Brown	Mayer Brown	Mayer Brown is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
McDermott, Will & Emery	McDermott, Will & Emery	McDermott, Will & Emery is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
McKinsey & Company, Inc. U.S.	McKinsey & Company, Inc. U.S.	McKinsey & Company, Inc. U.S. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Merrill Lynch	Merrill Lynch	Merrill Lynch is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Merrill Lynch Commodities	Merrill Lynch Commodities	Merrill Lynch Commodities is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Merrill Lynch, Pierce, Fenner & Smith	Merrill Lynch, Pierce, Fenner & Smith	Merrill Lynch, Pierce, Fenner & Smith is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
MetLife	MetLife	MetLife is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Milbak Tweed Hadley & McCloy	Milbak Tweed Hadley & McCloy	Milbak Tweed Hadley & McCloy is a current client of

Party in Interest	Entity with which FTI has a connection	Nature of connection
		one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Missouri Public Service Company dba Aquila, Inc.	Missouri Public Service Company dba Aquila Inc.	Missouri Public Service Company dba Aquila Inc. is a former client of one or more business units of FTI in matters adverse to the Debtors, but unrelated to these Chapter 11 Cases.
Mizuho	Mizuho	Mizuho is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mizuho Bank	Mizuho Bank	Mizuho Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mizuho Corporate Bank	Mizuho Corporate Bank	Mizuho Corporate Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Montague	Montague	Montague is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Morgan Stanley / ISG Operations	Morgan Stanley / ISG Operations	Morgan Stanley / ISG Operations is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Morgan Stanley Bank	Morgan Stanley Bank	Morgan Stanley Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Morgan Stanley Capital Group	Morgan Stanley Capital Group	Morgan Stanley Capital Group is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Morrison & Foerster	Morrison & Foerster	Morrison & Foerster is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
MS Amlin	MS Amlin	MS Amlin is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
MUFG	MUFG	MUFG is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
MUFG Union Bank, N.A.	MUFG Union Bank, N.A.	MUFG Union Bank, N.A. is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Munger Tolles	Munger Tolles	Munger Tolles is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Munger, Tolles & Olson	Munger, Tolles & Olson	Munger, Tolles & Olson is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Munich Re	Munich Re	Munich Re is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Munich Re U.S.	Munich Re U.S.	Munich Re U.S. is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
National Oilwell Varco	National Oilwell Varco	National Oilwell Varco is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Nationwide	Nationwide	Nationwide is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Nautilus Insurance Company	Nautilus Insurance Company	Nautilus Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
New Cingular Wireless PCS	New Cingular Wireless PCS	New Cingular Wireless PCS is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
NextEra	NextEra	NextEra is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
NextEra Energy Inc.	NextEra Energy Inc.	NextEra Energy Inc. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
NextEra Energy Marketing	NextEra Energy Marketing	NextEra Energy Marketing is a current client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
NextEra Energy Partners	NextEra Energy Partners	NextEra Energy Partners is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
NextEra Energy Resources	NextEra Energy Resources	NextEra Energy Resources is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Nixon Peabody	Nixon Peabody	Nixon Peabody is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Norton Rose	Norton Rose	Norton Rose is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Nossaman	Nossaman	Nossaman is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
NRG Energy	NRG Energy	NRG Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Nuclear Regulatory Commission	Nuclear Regulatory Commission	Nuclear Regulatory Commission is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Nuclear Regulatory Commission (NRC)	Nuclear Regulatory Commission (NRC)	Nuclear Regulatory Commission (NRC) is a current client of one or more business units of FTI in

Party in Interest	Entity with which FTI has a connection	Nature of connection
		matters unrelated to the Debtors and these Chapter 11 Cases.
NV Energy	NV Energy	NV Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
O'Melveny & Myers	O'Melveny & Myers	O'Melveny & Myers is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Oil Casualty Insurance Limited (OCIL)	Oil Casualty Insurance Limited (OCIL)	Oil Casualty Insurance Limited (OCIL) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Oracle America	Oracle America	Oracle America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Otis Elevator Company	Otis Elevator Company	Otis Elevator Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pabst	Pabst	Pabst is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pacific Bell Telephone Company	Pacific Bell Telephone Company	Pacific Bell Telephone Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pacific Life	Pacific Life	Pacific Life is a former client of one or more business units

Party in Interest	Entity with which FTI has a connection	Nature of connection
		of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pacificorp	Pacificorp	Pacificorp is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Paul Hastings	Paul Hastings	Paul Hastings is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Paul, Weiss, Rifkind, Wharton & Garrison	Paul, Weiss, Rifkind, Wharton & Garrison	Paul, Weiss, Rifkind, Wharton & Garrison is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pension Benefit Guaranty Corporation	Pension Benefit Guaranty Corporation	Pension Benefit Guaranty Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Perella Weinberg	Perella Weinberg	Perella Weinberg is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Calvin Perry	Calvin Perry	Calvin Perry is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Phillips 66	Phillips 66	Phillips 66 is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Pillsbury	Pillsbury	Pillsbury is a current client of one or more business units of

Party in Interest	Entity with which FTI has a connection	Nature of connection
		FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
PIMCO	PIMCO	PIMCO is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pitney Bowes Global Financial Services LLC	Pitney Bowes Global Financial Services LLC	Pitney Bowes Global Financial Services LLC is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Powerex	Powerex	Powerex is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Powerex Corp.	Powerex Corp.	Powerex Corp. is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
Powerex Energy	Powerex Energy	Powerex Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
PP&L	PP&L	PP&L is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
PSC Colorado	PSC Colorado	PSC Colorado is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
Praxair	Praxair	Praxair is a former client of one or more business units of FTI in matters unrelated to

Party in Interest	Entity with which FTI has a connection	Nature of connection
		the Debtors and these Chapter 11 Cases.
PricewaterhouseCoopers	PricewaterhouseCoopers	PricewaterhouseCoopers is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Prime Clerk	Prime Clerk	Prime Clerk is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Pro Safety & Rescue, Inc.	Pro Safety & Rescue, Inc.	Pro Safety & Rescue, Inc. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Procter & Gamble	Procter & Gamble	Procter & Gamble is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Progressive Direct Insurance Company	Progressive Direct Insurance Company	Progressive Direct Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Prologis	Prologis	Prologis is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Proskauer Rose	Proskauer Rose	Proskauer Rose is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Prudential	Prudential	Prudential is a current client of one or more business units

Party in Interest	Entity with which FTI has a connection	Nature of connection
		of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Prudential Financial	Prudential Financial	Prudential Financial is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Puget Sound Energy	Puget Sound Energy	Puget Sound Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
PWC	PWC	PWC is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
QBE Insurance Corporation	QBE Insurance Corporation	QBE Insurance Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
QBE Specialty Insurance Company	QBE Specialty Insurance Company	QBE Specialty Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Queen of the Valley Medical Center	Queen of the Valley Medical Center	Queen of the Valley Medical Center is a former client of one or more business units of FTI in matters involving the Debtors as co-defendant but unrelated to these Chapter 11 Cases.
RBC Capital Markets	RBC Capital Markets	RBC Capital Markets is a former client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
Realty Income Corporation	Realty Income Corporation	Realty Income Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Recurrent Energy	Recurrent Energy	Recurrent Energy is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Regents of the University of California	Regents of the University of California	Regents of the University of California is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Reliant Energy Services	Reliant Energy Services	Reliant Energy Services is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Republic Services	Republic Services	Republic Services is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
RLI Insurance Company	RLI Insurance Company	RLI Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Rosendin Electric	Rosendin Electric	Rosendin Electric is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Ropes & Gray	Ropes & Gray	Ropes & Gray is a current client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to the Debtors and these Chapter 11 Cases.
Rothschild	Rothschild	Rothschild is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Royal Bank of Canada	Royal Bank of Canada	Royal Bank of Canada is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Royal Bank of Canada (RBC)	Royal Bank of Canada (RBC)	Royal Bank of Canada (RBC) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Royal Bank of Scotland	Royal Bank of Scotland	Royal Bank of Scotland is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Royal Bank of Scotland ("RBS")	Royal Bank of Scotland ("RBS")	Royal Bank of Scotland ("RBS") is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Royal Sun Alliance	Royal Sun Alliance	Royal Sun Alliance is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
RPS	RPS	RPS is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Russell City Energy Company	Russell City Energy Company	Russell City Energy Company is a former client of

Party in Interest	Entity with which FTI has a connection	Nature of connection
		one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
San Diego Gas & Electric Co.	San Diego Gas & Electric Co.	San Diego Gas & Electric Co. is a former client of one or more business units of FTI in matters involving one or more of the Debtors but unrelated to these Chapter 11 Cases.
San Diego Gas and Electric	San Diego Gas and Electric	San Diego Gas and Electric is a former client of one or more business units of FTI in matters involving one or more of the Debtors but unrelated to these Chapter 11 Cases.
Luis Saavedra	Luis Saavedra	Luis Saavedra is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
SBA Communications Corporation	SBA Communications Corporation	SBA Communications Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Schindler Elevator Corp.	Schindler Elevator Corp.	Schindler Elevator Corp. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Schneider Electric USA	Schneider Electric USA	Schneider Electric USA is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Sedgwick	Sedgwick	Sedgwick is a former client of one or more business units of FTI in matters unrelated to

Party in Interest	Entity with which FTI has a connection	Nature of connection
		the Debtors and these Chapter 11 Cases.
Sempra Energy	Sempra Energy	Sempra Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Service Employees International	Service Employees International	Service Employees International is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Shell	Shell	Shell is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Shell Energy North America (US)	Shell Energy North America (US)	Shell Energy North America (US) is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
Sheppard Mullin	Sheppard Mullin	Sheppard Mullin is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Sidley Austin	Sidley Austin	Sidley Austin is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Siemens Energy	Siemens Energy	Siemens Energy is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Siemens Industry Inc.	Siemens Industry Inc.	Siemens Industry Inc. is a current client of one or more business units of FTI in matters unrelated to the

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Debtors and these Chapter 11 Cases.
Simpson Thacher & Bartlett	Simpson Thacher & Bartlett	Simpson Thacher & Bartlett is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
James Smith	James Smith	James Smith is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Jeffrey Smith	Jeffrey Smith	Jeffrey Smith is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Southern California Edison Company	Southern California Edison Company	Southern California Edison Company is a former client of one or more business units of FTI in matters involving the Debtors as co-plaintiff but unrelated to these Chapter 11 Cases.
Southern California Gas Company	Southern California Gas Company	Southern California Gas Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Sprint	Sprint	Sprint is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Sprint Spectrum- Nextel	Sprint Spectrum- Nextel	Sprint Spectrum- Nextel is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
SRI International	SRI International	SRI International is a former client of one or more business

Party in Interest	Entity with which FTI has a connection	Nature of connection
		units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Starwood Energy Group Global	Starwood Energy Group Global	Starwood Energy Group Global is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
State Farm	State Farm	State Farm is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
State Farm General Insurance Company	State Farm General Insurance Company	State Farm General Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
State Farm Mutual Automobile Insurance Company	State Farm Mutual Automobile Insurance Company	State Farm Mutual Automobile Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
State Farm Mutual Automobile Insurance Company	State Farm Mutual Automobile Insurance Company	State Farm Mutual Automobile Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Steptoe & Johnson	Steptoe & Johnson	Steptoe & Johnson is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Stop & Shop	Stop & Shop	Stop & Shop is a former client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to the Debtors and these Chapter 11 Cases.
Stroock & Stroock & Lavan	Stroock & Stroock & Lavan	Stroock & Stroock & Lavan is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Sumitomo Mitsui Banking Corporation	Sumitomo Mitsui Banking Corporation	Sumitomo Mitsui Banking Corporation is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Suncor Energy	Suncor Energy	Suncor Energy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Sunflower Bank, National Association	Sunflower Bank, National Association	Sunflower Bank, National Association is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
T. Rowe Price Associates	T. Rowe Price Associates	T. Rowe Price Associates is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
TALX Corp.	TALX Corp.	TALX Corp. is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Robert Taylor	Robert Taylor	Robert Taylor is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
TD Bank, N.A.	TD Bank, N.A.	TD Bank, N.A. is a current client of one or more business units of FTI in matters

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to the Debtors and these Chapter 11 Cases.
TD Securities	TD Securities	TD Securities is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Teachers Insurance and Annuity Association of America (TIAA)	Teachers Insurance and Annuity Association of America (TIAA)	Teachers Insurance and Annuity Association of America (TIAA) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Technology Insurance Company	Technology Insurance Company	Technology Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Tesoro Refining & Marketing Company	Tesoro Refining & Marketing Company	Tesoro Refining & Marketing Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Tetra Tech	Tetra Tech	Tetra Tech is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
The Bank of New York Mellon	The Bank of New York Mellon	The Bank of New York Mellon is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
The Bank of New York Mellon, N.A.	The Bank of New York Mellon, N.A.	The Bank of New York Mellon, N.A. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
The Bank of New York Trust Company, N.A.	The Bank of New York Trust Company, N.A.	The Bank of New York Trust Company, N.A. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
The Bank of Tokyo-Mitsubishi UFJ	The Bank of Tokyo-Mitsubishi UFJ	The Bank of Tokyo-Mitsubishi UFJ is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
T-Mobile	T-Mobile	T-Mobile is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
T-Mobile USA	T-Mobile USA	T-Mobile USA is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
The Regents of the University of California	The Regents of the University of California	The Regents of the University of California is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
The Travelers Indemnity Company	The Travelers Indemnity Company	The Travelers Indemnity Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
The Travelers Indemnity Company Of America	The Travelers Indemnity Company Of America	The Travelers Indemnity Company Of America is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
The Vanguard Group	The Vanguard Group	The Vanguard Group is a former client of one or more business units of FTI in

Party in Interest	Entity with which FTI has a connection	Nature of connection
		matters unrelated to the Debtors and these Chapter 11 Cases.
Tiger Natural Gas, Inc.	Tiger Natural Gas, Inc.	Prior to the Petition Date, FTI's Forensic & Litigation Consulting business segment was retained by counsel to provide litigation support to Tiger Natural Gas, Inc. in litigation against the Debtors.
Toronto Dominion Bank	Toronto Dominion Bank	Toronto Dominion Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Total Gas	Total Gas	Total Gas is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
TransCanada Energy Ltd.	TransCanada Energy Ltd.	TransCanada Energy Ltd. is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
Travelers Insurance Company of America	Travelers Insurance Company of America	Travelers Insurance Company of America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Troutman Sanders	Troutman Sanders	Troutman Sanders is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Turner Construction Company	Turner Construction Company	Turner Construction Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Twin City Fire Insurance Company	Twin City Fire Insurance Company	Twin City Fire Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
UBS Investment Bank	UBS Investment Bank	UBS Investment Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
UBS Securities	UBS Securities	UBS Securities is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
UCSF	UCSF	UCSF is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Union Bank of California	Union Bank of California	Union Bank of California is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Union Pacific Railroad Company	Union Pacific Railroad Company	Union Pacific Railroad Company is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving the Debtors.
United Airlines (Cogen)	United Airlines (Cogen)	United Airlines (Cogen) is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
United Energy	United Energy	United Energy is a former client of one or more business units of FTI in matters opposed to the Debtors but

Party in Interest	Entity with which FTI has a connection	Nature of connection
		unrelated to these Chapter 11 Cases.
United Energy Trading, LLC	United Energy Trading, LLC	United Energy Trading, LLC is a former client of FTI's Forensic & Litigation Consulting Group in matters opposed to the Debtors but unrelated to these Chapter 11 Cases.
United Rentals	United Rentals	United Rentals is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
United Services Automobile Association	United Services Automobile Association	United Services Automobile Association is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
United States of America	United States of America	United States of America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
United Technologies Corp.	United Technologies Corp.	United Technologies Corp. is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Univar USA	Univar USA	Univar USA is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
University of Miami	University of Miami	University of Miami is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
US Bank	US Bank	US Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
U.S. Bank, N.A.	U.S. Bank, N.A.	U.S. Bank, N.A. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
U.S. Bank N.A. Global Corporate Trust Services	U.S. Bank N.A. Global Corporate Trust Services	U.S. Bank N.A. Global Corporate Trust Services is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
US Bank National Association	US Bank National Association	US Bank National Association is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
U.S. Bank National Association	U.S. Bank National Association	U.S. Bank National Association is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
U.S. Department of the Interior	U.S. Department of the Interior	U.S. Department of the Interior is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
U.S. Department of Justice	U.S. Department of Justice	U.S. Department of Justice is a former client of one or more business units of FTI in matters opposed to the Debtors, but unrelated to these Chapter 11 Cases.
U.S. Environmental Protection Agency	U.S. Environmental Protection Agency	U.S. Environmental Protection Agency is a current client of one or more

Party in Interest	Entity with which FTI has a connection	Nature of connection
		business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
US Nuclear Regulatory Commission	US Nuclear Regulatory Commission	US Nuclear Regulatory Commission is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
US Pipeline	US Pipeline	US Pipeline is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
US Securities and Exchange Commission	US Securities and Exchange Commission	US Securities and Exchange Commission is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
US Steel	US Steel	US Steel is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
USAA Casualty Insurance Company	USAA Casualty Insurance Company	USAA Casualty Insurance Company is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
USS-POSCO	USS-POSCO	USS-POSCO is a current client of FTI's Forensic & Litigation Consulting Group in the Environmental Solutions Engagement, involving one or more of the Debtor.
Valero Refining Company	Valero Refining Company	Valero Refining Company is a former client of one or more business units of FTI in matters adverse to Pacific

Party in Interest	Entity with which FTI has a connection	Nature of connection
		Gas & Electric Company but unrelated to these Chapter 11 Cases.
Valero Refining Company-California	Valero Refining Company-California	Valero Refining Company-California is a former client of one or more business units of FTI in matters adverse to Pacific Gas & Electric Company but unrelated to these Chapter 11 Cases.
Valspar Corporation	Valspar Corporation	Valspar Corporation is a current client of one or more business units of FTI in the Environmental Solutions Engagement, involving one or more of the Debtor.
Van Ness Feldman	Van Ness Feldman	Van Ness Feldman is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Vedder Price	Vedder Price	Vedder Price is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Verizon Wireless	Verizon Wireless	Verizon Wireless is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Vista Energy Marketing, LP	Vista Energy Marketing, LP	Vista Energy Marketing, LP is a former client of one or more business units of FTI in matters adverse to the Debtors but unrelated to these Chapter 11 Cases.
Vitol	Vitol	Vitol is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Robert Walsh	Robert Walsh	Robert Walsh is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wartsila North America	Wartsila North America	Wartsila North America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Waste Management	Waste Management	Waste Management is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Weatherford International	Weatherford International	Weatherford International is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Weil, Gotshal & Manges	Weil, Gotshal & Manges	Weil, Gotshal & Manges is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wells Fargo	Wells Fargo	Wells Fargo is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wells Fargo Bank	Wells Fargo Bank	Wells Fargo Bank is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wells Fargo Bank National Association	Wells Fargo Bank National Association	Wells Fargo Bank National Association is a current client of one or more business units of FTI in matters unrelated to

Party in Interest	Entity with which FTI has a connection	Nature of connection
		the Debtors and these Chapter 11 Cases.
Wells Fargo Bank Northwest	Wells Fargo Bank Northwest	Wells Fargo Bank Northwest is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wells Fargo Bank Northwest, National Association, as Trustee Mac: U1228-051	Wells Fargo Bank Northwest, National Association, as Trustee Mac: U1228-051	Wells Fargo Bank Northwest, National Association, as Trustee Mac: U1228-051 is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wells Fargo Securities	Wells Fargo Securities	Wells Fargo Securities is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Western Asset Management Company	Western Asset Management Company	Western Asset Management Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Westinghouse Electric Co.	Westinghouse Electric Co.	Westinghouse Electric Co. is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
White & Case	White & Case	White & Case is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Mark Williams	Mark Williams	Mark Williams is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
Robert Williams	Robert Williams	Robert Williams is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Williams Capital	Williams Capital	Williams Capital is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Williams Scotsman	Williams Scotsman	Williams Scotsman a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Willis Towers Watson	Willis Towers Watson	Willis Towers Watson is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Willkie Farr & Gallagher	Willkie Farr & Gallagher	Willkie Farr & Gallagher is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wilmer Hale	Wilmer Hale	Wilmer Hale is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Winston & Strawn	Winston & Strawn	Winston & Strawn is a current client of one or more of the business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
XL Insurance America	XL Insurance America	XL Insurance America is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Party in Interest	Entity with which FTI has a connection	Nature of connection
XL Insurance Company	XL Insurance Company	XL Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
XL Specialty Insurance Company	XL Specialty Insurance Company	XL Specialty Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Jeffrey Young	Jeffrey Young	Jeffrey Young is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Zayo Group	Zayo Group	Zayo Group is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Yang Zhang	Yang Zhang	Yang Zhang is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Zurich American Insurance Company	Zurich American Insurance Company	Zurich American Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Zurich Insurance Company	Zurich Insurance Company	Zurich Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.